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**In the Matter Of:**

**Snyder**

**V.**

**Citi Steel, USA, Inc.**

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**Transcript of:**

**Terry L. Snyder**

**Volume # 2**

**June 6, 2006**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

TERRY L. SNYDER, )  
)  
Plaintiff, )  
) Civil Action  
v. ) No. 04-970-JJF  
)  
CITI STEEL USA, INC., )  
)  
Defendant. )

Continued deposition of TERRY L. SNYDER taken pursuant to notice at the law offices of Young, Conaway, Stargatt & Taylor, 1000 West Street, Wilmington, Delaware, beginning at 9:08 a.m. on Tuesday, June 6, 2006, before Eleanor J. Schwandt, Registered Merit Reporter and Notary Public.

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1 (TERRY L. SNYDER, having been previously  
2 duly sworn, was examined and testified further as  
3 follows:)  
4 CONTINUED EXAMINATION  
5 BY MS. DIBIANCA:  
6 Q. This is a continuation of Terry Snyder's  
7 deposition, day two, and present in the room today are  
8 myself, Margaret DiBianca, representing CitiSteel; Lori  
9 Brewington, on behalf of plaintiff; and Terry Snyder,  
10 plaintiff; and Debbie Coles, paralegal representing  
11 CitiSteel.  
12 Miss Snyder, have you discussed this  
13 deposition or last week's deposition with your attorney  
14 or anyone from your attorney's office since we last met?  
15 A. No.  
16 Q. Have you done anything since last week when we  
17 met to refresh your recollection as to any of the topics  
18 we discussed last week?  
19 A. There was one. I was at work the next day, and I  
20 don't know what or how, something popped into my head.  
21 That package of e-mails from Carmella, if  
22 you look at the second page, it is her apologizing for  
23 not spending more time with me. She is behind in  
24 training me.

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1 She -- in standard costs, I was supposed to  
2 be taking over standard costs as a part of my job  
3 description, and she apologizes for not spending enough  
4 time with me and getting me caught up-to-date. Maybe not  
5 those exact words, but if you look at it, so...  
6 Q. Anything else?  
7 A. No, not that I can think of at the moment.  
8 Q. That was Snyder Exhibit 7, and you are  
9 referencing page 2.  
10 A. Yes.  
11 Q. If you just want to point it out to me, that will  
12 be fine.  
13 A. No, not this one. The one from Carmella.  
14 Oh, I'm sorry. It must have been page --  
15 well in this e-mail from Carmella it says --  
16 Q. Can you tell me the page number? At the very  
17 bottom it says Snyder Exhibit Page and then a number.  
18 A. Snyder page 004. It says, "Anyway, I didn't read  
19 your e-mail carefully the first time." This is from  
20 Carmella. "I thought you said 'they' said I came up to  
21 them and complained about your job performance. I didn't  
22 read carefully that it was Greg who went around asking  
23 everyone about you. That part is true, he did ask me  
24 that about a week ago but I know I didn't say anything

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1 that indicated you weren't doing your job. Greg wanted  
2 to know if you were doing everything you were supposed to  
3 do and I told him that you're doing everything that you  
4 can do under the circumstances and the example I gave him  
5 was that it was difficult for you to complete the  
6 alloy/flux usage verification before 7:30 a.m. because of  
7 other responsibilities you had like ISOs," they are ISO  
8 procedures actually is what they are, "and other morning  
9 reports. I also said that you don't get the Melter's  
10 report till after 7:30 a.m. I told him that I thought  
11 you were given too much responsibilities that makes it  
12 hard for you to try to meet certain deadlines. Also, you  
13 can't do your job if other people don't provide you with  
14 the necessary information you need," such as the physical  
15 inventory numbers.  
16 It just goes on to say, "Greg didn't ask  
17 specifically about the morning reports, that was just an  
18 example I gave him to make him understand that it wasn't  
19 'you' but rather the 'various responsibilities &  
20 deadlines' 'they' demanded on you was the issue but I  
21 guess he didn't interpret it that way. But that's not a  
22 problem, I have no problem whatsoever in going to Greg  
23 and straightening that out but I won't go against your  
24 wish. If you don't want me to say anything because you

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1 feel they might hold that against you, I will respect  
2 your wish. But any time you need me to straighten this  
3 out just let me know and I'll do it."  
4 Excuse me for one moment. There is a part  
5 about her mentioning the standard costs. Well, I  
6 actually have a copy of it at home. I could have sworn I  
7 seen it in here the other day.  
8 Q. Do you think there is another document that's not  
9 in this exhibit?  
10 A. I'm not saying. I know I seen the word standard  
11 costs. Maybe I'm just missing it right now.  
12 MS. BREWINGTON: Here it is. Can I?  
13 A. Okay. By the way, since -- forgive me. I'm  
14 skipping down a couple paragraphs.  
15 "By the way, since they're giving you a hard  
16 time about coming over here," see, I had to go up to her  
17 office, I had to try find time in the day for her to try  
18 to train me on standard costs, "coming over here, that's  
19 no problem...I'll just come up to your office instead  
20 when I'm ready to train you with the supplies in Standard  
21 Costs. Okay with you? Rats, gotta get back to work."  
22 There was more. "Good thing I saved a  
23 bunch."  
24 Q. When did you recall this? Is this document

2 (Pages 250 to 253)



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1 something you reviewed over the week?  
2 **A. I was at work the next day and I just, I**  
3 **remembered seeing the word "standard costs" and I**  
4 **remembered Carmella always apologizing for not training**  
5 **me quick enough in standard costs, because she had a lot**  
6 **to do and I had a lot to do. And some of the reports**  
7 **that I had to do, I can't get them done if the other --**  
8 **if the melters don't supply me with the numbers of the**  
9 **usage and so forth. So my report can't be done unless**  
10 **you report to me.**

11 **But, one, part of my job description, I was**  
12 **supposed to be taking over standard costs. If you are**  
13 **not training me quick enough or well enough in it, then I**  
14 **don't know it yet.**

15 Q. Who were you taking it over from?

16 **A. Carmella. She was the one that was supposed to**  
17 **be -- maybe I have it at home. But she apologizes for**  
18 **that.**

19 **Okay. Wait a minute. I'm sorry. If I may**  
20 **continue on another paragraph. Well, there is the first**  
21 **line and then there is three -- it is the fourth**  
22 **paragraph down. "Let's definitely do lunch on Friday so**  
23 **we can talk about this in details. Also, we might as**  
24 **well take advantage of outlining notes and issues to**

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1 **discuss when we do have that inventory meeting. Does**  
2 **that sound good to you? This would be a good opportunity**  
3 **for me to set the record straight about your job**  
4 **performance because I can print out 'their' problems and**  
5 **not yours. The storeroom receipts of course is still an**  
6 **issue which you did point out."**

7 **Sometimes, if I may, I'm saying this in**  
8 **general now because myself, if truck drivers, delivery**  
9 **and so forth, if the storeroom didn't get their receipts,**  
10 **if I don't get copies, if they are not put in my box,**  
11 **that also can, you know, reflect me being able to do, you**  
12 **know, one of my jobs. That's another, as far as the**  
13 **storeroom supplying the receipts.**

14 **"Good thing I saved a bunch of them to show**  
15 **them so they know we're not just making this up. Till we**  
16 **meet on Friday, do whatever you have to do to 'cover your**  
17 **you butt', even if that means you have to send me**  
18 **'formal' e-mails with 'cc' to everyone else, that's fine**  
19 **with me. Got no problem with that."**

20 Q. Those e-mails show that you had not been properly  
21 trained or not trained at that time; is that correct?

22 **A. In the one field. But that also shows -- would**  
23 **you like that back, ma'am? That also is her stating that**  
24 **I cannot get my job, meet all deadlines until I receive**

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1 **receipts and such as from others.**

2 Q. Did anyone, did a supervisor give you any kind of  
3 problems about not turning in those reports in a timely  
4 fashion?

5 **A. I don't know if you have copies of, but I know I**  
6 **do. I have copies of e-mails that I sent out to melters**  
7 **stating, such as ISO procedures -- once an ISO procedure**  
8 **is redone, rewritten, I have to do it, so, but then say**  
9 **if there is three or four names of supervisors on that**  
10 **ISO, as long as they all verify -- if one of them makes**  
11 **one change on it, I have to redo the whole thing, send it**  
12 **back out to the three, four different supervisors, and**  
13 **that's the original copy.**

14 **I have copies myself of e-mails showing that**  
15 **I sent them supervisors, please read and sign, review, if**  
16 **you want it redone.**

17 Q. What supervisors?

18 **A. Not just supervisors, such as Randolph Harris.**

19 Q. He is head supervisor, correct?

20 **A. General supervisor. Whatever he is supposed to**  
21 **be.**

22 **What was the gentleman's name in charge of**  
23 **the ISO procedures? I can't believe I can't remember his**  
24 **name.**

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1 Q. Did anybody --

2 **A. Melters, such as melters, Greg Buragino, he had**  
3 **to review.**

4 Q. But my question is: Did any supervisor express  
5 any kind of concern about the reports being generated  
6 late?

7 **A. No. I did. I did, because if they didn't review**  
8 **them and revise them -- see, say three of you ladies**  
9 **sitting there, all three of you had a say in how a ISO**  
10 **procedure was supposed to be done, and say if supervisor**  
11 **A wants it done this way, then I have to pass it on to**  
12 **the others, and once you read it, if you don't like the**  
13 **way she did it, say you are supervisor B, you will**  
14 **scratch that off, you will revise it. I have to retype**  
15 **it, send it back around, and get all three of your**  
16 **signatures until all three of you agree on the way that**  
17 **ISO procedure is to be done.**

18 **Sometimes ISO procedures wouldn't be signed,**  
19 **including by Randolph Harris. They would just sit there,**  
20 **and I would repeatedly ask for them, and I have e-mails**  
21 **showing that I need them and I want them.**

22 **I forget the gentleman's name who actually**  
23 **ran the ISO procedure. I have it at home. I can't**  
24 **believe -- because I would work directly with him**

3 (Pages 254 to 257)

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1 sometimes. I can't believe I can't remember his name,  
2 but...  
3 Q. Well, we can get to that later. I wanted to see,  
4 did you have an opportunity to review any other kind of  
5 documents or speak to anyone that would help you recall  
6 the things that we discussed last time or anything  
7 related to this case?  
8 A. No.  
9 Q. No?  
10 A. No.  
11 Q. Are you on any kind of medication or anything  
12 that would cloud your mind and limit your ability to  
13 testify truthfully today?  
14 A. No. Besides maybe not remembering every little  
15 detail of my past entire life.  
16 Q. Any medicines that would prevent you from doing  
17 that?  
18 A. No.  
19 Q. Let's pick up at the date when you first met,  
20 after you reported your allegations to Mr. Ford.  
21 A. Excuse me.  
22 Q. And you met with I believe it was Mr. Downie.  
23 Was that April 8th or 9th?  
24 A. It was Tuesday, April 8th.

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1 Q. Okay. Now, I think you testified last time that  
2 you wrote and signed a written statement. Is that  
3 correct?  
4 A. Yes.  
5 Q. Let's have a look at it.  
6 A. Oh. You asked me earlier if there was anything  
7 else I remembered, and the one was Carmella. The second  
8 was actually Jerry Downie told me that he would be glad  
9 to meet with my father, because I wanted someone there.  
10 We weren't supposed to have a complete meeting until  
11 Thursday.  
12 Q. Actually, that's what we are going to talk about  
13 right now.  
14 A. Okay, that's good.  
15 Q. Let's do that and we will do it in chronological  
16 order as the sequence of events went. So let's start  
17 with the statement, and I believe that we admitted it  
18 last time so let me just see. It was Snyder 6, at page  
19 22, also referenced as D207.  
20 MS. COLES: It is Exhibit 6?  
21 MS. BREWINGTON: Can I see the cover? I  
22 think mine are numbered wrong.  
23 MS. DIBIANCA: That's it.  
24 MS. BREWINGTON: I have it labeled as 7.

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1 Okay.  
2 BY MS. DIBIANCA:  
3 Q. All right. Just for the record, you wrote and  
4 signed this statement; is that correct?  
5 A. Yes, ma'am.  
6 Q. And these are your own words; is that correct?  
7 A. Yes, ma'am.  
8 Q. And if you had been under oath at the time you  
9 wrote this and signed this, would your statements have  
10 been any different?  
11 A. No, ma'am.  
12 Q. And at this time is there anything that you would  
13 like to change or alter in this statement?  
14 A. No, ma'am.  
15 Q. Then when did the topic of the tapes first come  
16 up?  
17 A. I'm not following your question.  
18 Q. Let me clarify it for you. Did you at any time  
19 tell Mr. Downie that you had audio tapes that would  
20 support your allegations?  
21 A. Yes.  
22 Q. And when did you first mention them?  
23 A. When I wrote this for him.  
24 Q. What was his response?

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1 A. Well, I offered -- well, actually, I told Mr.  
2 Ford, when Mr. Ford said he didn't believe me, and I  
3 said, "I don't care what you believe and it is not your  
4 place to judge me like that," I'm pretty sure I informed  
5 Mr. Ford as well that I had him on tape, once they called  
6 me down, and I offered to go down to my house and let him  
7 hear the tapes.  
8 Q. Let who hear the tapes?  
9 A. Well, they could all listen to them. But the  
10 people that was in the room at the moment, Jerry Downie  
11 and Greg Buragino.  
12 Q. Okay. Not Mr. Ford?  
13 A. He wasn't in the room when I got down there. He  
14 called for me to come down, but he wasn't there.  
15 Q. Okay.  
16 A. And Mr. Downie didn't want to reach those  
17 channels.  
18 Q. Were those his words?  
19 A. Yes, ma'am.  
20 Q. What do you think he meant by that, he did not  
21 want to reach those channels? How did you understand  
22 those words at the time?  
23 A. He didn't want to hear them. He believed me,  
24 especially, also giving me the benefit of the doubt.

4 (Pages 258 to 261)

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1 Q. Did he indicate that?  
2 **A. Yes.**  
3 Q. Did he say that he would never want to listen to  
4 the tapes or just he did not need to go down those  
5 channels yet?  
6 **A. He didn't want to reach those channels yet.**  
7 Q. Yet?  
8 **A. Yet, yes.**  
9 Q. Did you tell him you had any other kind of  
10 tangible evidence such as diaries or notes?  
11 **A. Yes. A few notes. Like I would be sporadic with**  
12 **my diary. Like sometimes, you know, I'm tired or I just**  
13 **don't feel like, sometimes even now, like I don't go home**  
14 **every single day and sit there and write in my diary.**  
15 **You know what I mean?**  
16 **Like my book in my car, I'll have a little**  
17 **note, and then like say maybe like five days I'll go, you**  
18 **know, after writing a bunch of little things here and**  
19 **there, then I will go back and fill in things.**  
20 Q. Did you tell Mr. Downie that you had these notes?  
21 **A. Yeah. A few notes of a few dates, specific**  
22 **dates, yes.**  
23 Q. And why did you tell him that?  
24 **A. Whatever he was asking me at the time.**

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1 Q. Why did you tell him that?  
2 **A. Whatever he was asking me at the time.**  
3 Q. Oh, it was just relevant to what he was asking?  
4 **A. Yes.**  
5 Q. To support your claim?  
6 **A. Yes, yes.**  
7 Q. And what was his response?  
8 **A. He just wanted it on paper.**  
9 Q. The written statement?  
10 **A. Mm-hmm. He just wanted what Mr. Harris had been**  
11 **doing to me on paper. That's all he asked.**  
12 Q. And what happened after you discussed the tapes?  
13 **A. Well, it was the end of the day, my workday, so I**  
14 **went home.**  
15 **Now, in the morning -- do you want this? In**  
16 **the morning when Randolph came in and then three hours**  
17 **later, when they called me down to the first building,**  
18 **that's when they ended up following me so forth.**  
19 Q. Are we on the next day right now or the same day?  
20 **A. This day ended.**  
21 Q. Okay. Let's finish that day then. Your workday  
22 ended so you went home?  
23 **A. By the time they were done with me, the day was**  
24 **done. Okay. He wanted me -- then the next day after**

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1 **they followed me around --**  
2 Q. I want to finish that day.  
3 **A. I'm trying get to the point where he wanted me to**  
4 **hand him the tapes.**  
5 Q. Well, let's finish the day, though.  
6 **A. That was it.**  
7 Q. Okay. Did you go? Did you leave? Did someone  
8 come pick you up? Did you go directly home? What  
9 happened?  
10 **A. Yes, I went home.**  
11 Q. And you drove yourself home?  
12 **A. Yes.**  
13 Q. And how did you conclude the meeting? Was there  
14 some discussion as to what would happen the next day or  
15 as a next step?  
16 **A. Yes.**  
17 Q. What was that?  
18 **A. We all were -- they were supposed to call me --**  
19 **he was supposed to call Mr. Harris first thing in the**  
20 **morning.**  
21 Q. Mr. Downie?  
22 **A. Yes. To come down to his office. And he was**  
23 **going to let me sit in while he spoke with him and so**  
24 **forth.**

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1 **When Randolph came in, I knew he knew.**  
2 Q. Let's stay with the one day. I just want to  
3 finish that day.  
4 **A. That day was done, so I don't know.**  
5 Q. What did he tell you that day?  
6 **A. That's what he told me.**  
7 Q. And then did he say, Be here at 8:00 o'clock? Or  
8 did he say, I'll call you when I'm ready for you? That's  
9 what I'm trying to out. What else did he say? How did  
10 the meeting end?  
11 **A. I don't -- I assume they were just calling me,**  
12 **yes.**  
13 Q. Okay.  
14 **A. He was supposed to call Randolph down first, and**  
15 **I wanted to be there, and he told me I could be there,**  
16 **and he told me I could have anybody there.**  
17 Q. Did you specifically request to be in the meeting  
18 with Mr. Harris?  
19 **A. Yes.**  
20 Q. And he agreed, Mr. Downie agreed to that?  
21 **A. Yes.**  
22 Q. Did you specifically request to have anybody else  
23 present at the next day's meeting?  
24 **A. Not the next day, because my father, see, is down**

5 (Pages 262 to 265)

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1 New Jersey a lot.  
2 Q. So that would have come up later but not the  
3 first day?  
4 A. Exactly.  
5 Q. And then any mention of this idea of your  
6 transferring to the shipping department, did that come up  
7 that day?  
8 A. No.  
9 Q. That came up for the first time when?  
10 A. Wednesday, when they were following me around.  
11 Q. Wednesday was the following day?  
12 A. Yes, ma'am. The 9th.  
13 Q. Okay. So let's go ahead and jump to that then,  
14 the 9th. Tell me what happened on the 9th. You did  
15 testify quite a bit about this last time so we don't need  
16 to rehash all of it, but if you can do your best to  
17 summarize it, and then I'll --  
18 A. They lied. Nothing took place the way they said  
19 it was going to take place.  
20 Q. Who lied?  
21 A. Mr. Downie.  
22 Q. Is Mr. Downie generally a truthful person?  
23 A. I have no clue.  
24 Q. Did you consider him to be a truthful person at

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1 that time?  
2 A. I have no clue. I didn't work for him. I  
3 considered him to be a very rude and arrogant person  
4 towards other people, especially in front of other  
5 people. But as far as even having this long of a  
6 conversation with him, we never did so, so...  
7 Q. All right. So, go ahead.  
8 A. When they called me down, I said, "Where is  
9 Randolph Harris?" I said, "Nothing went as you said it  
10 was going to be. You said I could be there. What did he  
11 say?"  
12 "None of your business. I don't have to  
13 tell you anything."  
14 Q. Who is saying this?  
15 A. Mr. Downie.  
16 Q. So Mr. Downie said, "I don't have to tell you  
17 what Mr. Harris said?"  
18 A. Exactly. It is none of my business.  
19 Q. Okay.  
20 A. He wanted me to go home and think about things  
21 for the day. He, well, he offered to ship me to  
22 shipping. And I got angry and I said, "For what?" I  
23 said, "I didn't do anything." I said, "Ship him to  
24 shipping." And I said, "I want to go back to my office."

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1 I said, "I have another supervisor up there." I said,  
2 "This is wrong."  
3 And they begged me not to go back. And I  
4 said, "You told me I could be in a meeting." And I  
5 wanted my father there. My father, we all -- it was  
6 going to be for Thursday. He told -- I had a bill of  
7 lading to deliver to Carmella. I told him this meeting  
8 was over because I wanted my father there. I wanted  
9 somebody there on my side so they couldn't try to turn  
10 around and just get rid of me.  
11 Q. So let's talk about that, because we didn't talk  
12 too much about that last time, so let's elaborate there.  
13 A. Yes.  
14 Q. When you went down to the meeting, Mr. Downie was  
15 there and who else?  
16 A. Jim Ryan.  
17 Q. Jim Ryan was there, okay. Anybody else?  
18 A. No, ma'am.  
19 Q. Who spoke first? Did you speak first? Did Mr.  
20 Downie speak first?  
21 A. I don't remember.  
22 Q. What was the first thing you remember about the  
23 meeting?  
24 A. Well, when I walked in, there was a big pile of

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1 papers -- when you walk in, there is a desk here, and a  
2 little round table here, and there was a big pile of  
3 papers. I don't think I said anything, but I just  
4 remembered seeing a big pile of papers, and I assumed  
5 they were getting rid of me.  
6 Q. Why did you assume that?  
7 A. I don't know. Because they wouldn't -- the way,  
8 just -- I don't know. I just did.  
9 Q. Then what was the first statement you remember?  
10 A. Wait a minute. That might have been on Thursday.  
11 Wait a minute. Wait a minute. Wait a minute.  
12 No, that was Thursday morning. The pile of  
13 papers was Thursday morning, because that is when he  
14 asked me to come straight to him before I reported to my  
15 office.  
16 Wednesday, when I went down -- Wednesday,  
17 when I went down there at 11:00, it was around 11:30 is  
18 when they started following me around, that's the first  
19 offer they made to ship me to shipping.  
20 I had to deliver a bill of lading to  
21 Carmella. I went up to Carmella's office. That's when  
22 they were standing behind Carmella. Carmella was facing  
23 me.  
24 Q. Okay. We heard about this last time so I want,

6 (Pages 266 to 269)



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1 just because I want to try to not take all day today,  
2 because we don't want to be here until 5:00 o'clock, if  
3 there is stuff you testified about last time, I'm going  
4 to let you skip it. I'll indicate that to you.  
5 **A. I ended the meeting and that's why they followed**  
6 **me. I ended the meeting because he lied and told me that**  
7 **my father could be there. I wanted a witness.**  
8 Q. Let's talk about that. What came first? Did you  
9 say something about Mr. Harris being conferenced with  
10 prior? Did the transfer to shipping come up first? What  
11 was the sequence of events during the meeting?  
12 **A. They tried to make me an offer to ship me to**  
13 **shipping and I said no.**  
14 Q. That was the first thing that you can recall --  
15 wait one second -- that occurred during the meeting?  
16 **A. Yes.**  
17 Q. Okay. Did he say, and I do want to get to the  
18 transfer issue, but did Mr. Downie talk to you about why  
19 he wanted to transfer, why he had come to that  
20 suggestion?  
21 **A. Well, it is on tape. He never would answer it.**  
22 **I asked him, I said, "Why transfer me to shipping?" I**  
23 **said, "Why not him?" I said, "Randolph is the harasser."**  
24 **I said, "I'm the, you know, the one being harassed or**

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1 **harassee," however you say it.**  
2 Q. Did he give you an explanation?  
3 **A. No, he didn't. No, he didn't.**  
4 Q. So did he provide you with any information as to  
5 why he wanted to --  
6 **A. Well --**  
7 Q. -- why he wanted to make the transfer?  
8 **A. No, none at all. He told me if I did not accept**  
9 **the transfer that I am voluntarily resigning. And I**  
10 **said, "No, I'm not." I said, "I'm going back to my**  
11 **office." And I ended that meeting.**  
12 Q. Was that the first time the issue of the transfer  
13 had come up?  
14 **A. Yes, ma'am.**  
15 Q. Then the issue of you wanting to have another  
16 party there on your behalf, when was that raised?  
17 **A. Well, Wednesday. And he told me -- no, the first**  
18 **time I mentioned it may have been Tuesday, on the 8th,**  
19 **before I left. But I wanted to be there when Randolph**  
20 **made his statement Wednesday morning. But he told me**  
21 **that we all could meet and anybody can be in the meeting,**  
22 **whomever I like.**  
23 **Well, when they called me down on Wednesday,**  
24 **after meeting with Randolph, when they were trying to**

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1 **stop me from going back to my office, and that's when**  
2 **they were following me, I finally, once I realized they**  
3 **weren't letting me go back to my office, I went home. He**  
4 **said, "You sleep on it." I said, "No, you sleep on it."**  
5 Q. We are on the 9th now?  
6 **A. Now it is back on the 9th, yes. And that is when**  
7 **I knew that they -- by them following me around and not**  
8 **letting me go back to my office, I knew what they were**  
9 **going to try to do to me.**  
10 **So that day, it was pouring down rain, and I**  
11 **went to EEOC, and that's when Jerry Downie kept calling**  
12 **my home, and he wanted me to drop the tapes off to him.**  
13 **And I wasn't going to do that. I would have let him**  
14 **listen to them, but I wasn't going to just hand them my**  
15 **tape recorders.**  
16 Q. How long after you left the meeting did he call  
17 you?  
18 **A. Well, I don't know. My mother said he called**  
19 **about six times. Maybe you could call the phone company**  
20 **and get some phone records or something. I don't know.**  
21 Q. Do you recall --  
22 **A. I was up at EEOC in Philadelphia. But he kept**  
23 **calling my mother.**  
24 Q. What would have been the earliest he called?

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1 **A. I have no idea.**  
2 Q. What time did you leave work?  
3 **A. You mean what time wouldn't they let me go back**  
4 **to my office? I guess this would have been after 12:00,**  
5 **a little after 12:00 maybe.**  
6 Q. 12:00 noon?  
7 **A. Yes.**  
8 Q. And this is when your significant other --  
9 **A. 12:30, 1:00. I'm going to say in between 12:00**  
10 **and 1:00. I don't know the exact time.**  
11 Q. And Mr. Tobin came and picked you up at that  
12 time?  
13 **A. Yes, ma'am.**  
14 Q. And then when did you first speak with your  
15 mother that day?  
16 **A. After I -- I always leave my cell phone on**  
17 **vibrate or in a vehicle, you know, when I'm going in**  
18 **somewhere important. I don't take the cell phone.**  
19 Q. So when was --  
20 **A. Once I was done in EEOC and got back in the**  
21 **vehicle, I called my mother. I always call her to check**  
22 **on her, wherever I'm going and whenever I'm leaving**  
23 **something. And she was all hysterical saying Mr. Downie**  
24 **wouldn't stop calling.**

7 (Pages 270 to 273)

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1 Q. When did you call your mother?  
2 **A. As soon as I was done in EEOC.**  
3 Q. Can you give me an estimate as to that time?  
4 **A. I was there for a couple hours. I'm really not**  
5 **sure.**  
6 Q. So before 5:00 o'clock, would you think that's --  
7 **A. Yes, yes.**  
8 Q. So Mr. Downie called, would have had to have  
9 called no more than a few hours after you left the  
10 property; is that correct?  
11 **A. Yes.**  
12 Q. Now, Mr. Downie asked your mother to please have  
13 you bring the tapes with you to your meeting?  
14 **A. No. After she told me he kept calling, I called**  
15 **him, and I said, "You called?"**  
16 **And he said, "Yes," he said, "Terry, if you**  
17 **like," he said, "you can drop those tapes off."**  
18 **And I was not dropping those tapes off. I**  
19 **would have sat there and let him listen to the tapes, but**  
20 **I would not drop them off. They were my only tape**  
21 **recorders and my only copies. And he wasn't -- I wasn't**  
22 **letting anybody have them actually.**  
23 Q. Okay. At this time had you decided to have  
24 another meeting on the 10th? You were supposed to go

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1 home and sleep about it, come back the next day?  
2 **A. He, he asked me not to go directly to my office.**  
3 **And I said to him, well, that day, on the 9th, when he**  
4 **followed me, got me in the second office, which is up on**  
5 **the hill where he followed me to, he is telling me he**  
6 **wants to keep the dust down.**  
7 **I said, "I'll keep the dust down, but," I**  
8 **said, "in writing, if you give me those two papers, that**  
9 **lie you made up about me."**  
10 Q. You are referring to what?  
11 **A. They tried to have me written up a month or two**  
12 **prior, whatever it was, which was totally false.**  
13 Q. Okay.  
14 **A. And the second one was why, with his and Jerry**  
15 **Downie, with his and Randolph Harris' signatures, I**  
16 **wanted in writing why they wanted to transfer me and I**  
17 **wanted Randolph Harris to admit, and that's the day he**  
18 **told me to keep the dust down and they wanted me to sleep**  
19 **on it. They wouldn't let me go back to my office.**  
20 **They just sat there -- he sat there begging**  
21 **me. Jim Ryan didn't. Jim Ryan never said one word**  
22 **throughout Wednesday and throughout Thursday. Jim Ryan**  
23 **was quiet as a mouse. And he never said one word. And I**  
24 **sat there and I'm looking at him and I realized, a little**

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1 **red light came on and I realized they were not letting me**  
2 **go back to my office.**  
3 Q. This is the 10th or the 9th?  
4 **A. This is the 9th.**  
5 Q. And I'm asking on the 9th --  
6 **A. He said to me --**  
7 Q. Wait.  
8 **A. -- "Will you please report to me when you first**  
9 **come in?" And I said, "Should I come dressed for work?"**  
10 **And he said, "Yes."**  
11 **So Thursday morning, on the 10th, I came**  
12 **dressed for work, and when I walked in, on the little**  
13 **round table was a big pile of papers.**  
14 Q. And from that you concluded that they were going  
15 to terminate you?  
16 **A. Yes.**  
17 Q. Is that what you concluded?  
18 **A. In my mind. I kind of thought maybe he just said**  
19 **for me to come dressed for work because he didn't want to**  
20 **let me know in advance if I didn't take him up on his**  
21 **offer that they were going to remove me from the grounds.**  
22 Q. This offer was what?  
23 **A. You want me to repeat it again? Because you said**  
24 **you wanted to save time throughout the day. So you want**

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1 **me to repeat it again?**  
2 Q. The offer was to transfer?  
3 **A. Yes. Or I'm voluntarily resigning.**  
4 Q. Okay. That was the offer?  
5 **A. That was my choice. I had a choice.**  
6 **And I said, "There is no such thing as**  
7 **voluntarily resigning." And so the arbitrator at. The**  
8 **mediator at the Department of Labor, they even said that**  
9 **there is no such thing as voluntarily resigning.**  
10 Q. When he called your house and then you called him  
11 back on the 9th, regarding the tapes, he asked you to  
12 drop the tapes off?  
13 **A. Yes.**  
14 Q. You declined to do that; is that correct?  
15 **A. Yes.**  
16 Q. Tell me why that is. Why did you decline?  
17 **A. Well, in my mind, I wasn't dropping the tapes**  
18 **off. Just, I let him think whatever he wanted to think,**  
19 **actually.**  
20 Q. I'm asking you in your mind, why did you not want  
21 to drop the tapes off?  
22 **A. Because he would have deleted it.**  
23 Q. He would have deleted them?  
24 **A. Sure.**

8 (Pages 274 to 277)

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1 Q. Did you have reason to believe that he would  
2 delete them?  
3 **A. Would you drop off your only set of tapes? Would**  
4 **you drop off the only thing that you had against hundreds**  
5 **of men and an entire company of what was happening?**  
6 **Would you drop it off?**  
7 Q. Who are hundreds of men you are referring to?  
8 **A. I'm just saying, you are the only female up in**  
9 **this giant refinery -- not refinery but mill. Would you**  
10 **drop off the only thing that you had to prove what they**  
11 **said and did versus, now, one little you? Would you drop**  
12 **them off? I wouldn't and I wasn't.**  
13 Q. Okay.  
14 **A. But what you may do is very different from what I**  
15 **may do, so....**  
16 Q. He didn't ask you to bring them to the meeting on  
17 the 10th; is that correct?  
18 **A. No, he didn't.**  
19 Q. Would you have brought them to the meeting on the  
20 10th had he asked you?  
21 **A. Yes.**  
22 Q. Why? What would have been the difference?  
23 **A. Well, they would have been in my possession. I**  
24 **would have been right there.**

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1 Q. You would have been comfortable with that?  
2 **A. Sure.**  
3 Q. What about the diary and notes, did he ask you to  
4 bring those?  
5 **A. And my father was also going to be there.**  
6 **No. He may have. But he didn't ask me to**  
7 **bring anything. When I left on Wednesday he didn't ask**  
8 **me to bring anything.**  
9 Q. You mean the next day?  
10 **A. Now, when he called, when he called me, he told**  
11 **me I can on Thursday, if I want, and I did not.**  
12 Q. Come again. He told you you can what?  
13 **A. He said, "You can bring."**  
14 Q. Bring what?  
15 **A. The tapes. He may have mentioned the diaries as**  
16 **well, on Thursday.**  
17 Q. And you declined?  
18 **A. No, I didn't decline.**  
19 Q. Did you bring the tapes on Thursday?  
20 **A. He said if you feel -- I think he said, "If you**  
21 **feel comfortable," but I didn't bring them.**  
22 Q. Why?  
23 **A. I just didn't.**  
24 Q. Why?

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1 **A. I didn't want to. I don't know. I guess I**  
2 **didn't want to. I wanted my father there. I didn't take**  
3 **them with me.**  
4 Q. Did the tapes support your claim?  
5 **A. Yes.**  
6 Q. Did you not want to provide Mr. Downie with the  
7 opportunity just to believe you?  
8 **A. I just didn't -- I just didn't take them. I**  
9 **didn't want to -- I really didn't want to be there by**  
10 **myself with my stuff. I wanted my father there. And I**  
11 **told him that, and he told me -- then he changed his mind**  
12 **and told me he decided he was too busy and didn't want to**  
13 **meet with my father.**  
14 **So he reneged on everything. He reneged on**  
15 **the whole entire -- everything he promised me, he reneged**  
16 **on everything, so --**  
17 Q. I just want to get to the bottom of the tapes and  
18 the other evidence.  
19 **A. I did not take them. He said, "If you feel**  
20 **comfortable" -- first he wanted me to drop them off, and**  
21 **I wasn't about to drop them off on Wednesday. It was**  
22 **pouring down rain. It was late. I was on my way home**  
23 **from EEOC.**  
24 **But he said to me, "If you feel comfortable**

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1 **you can bring them tomorrow." But I did not.**  
2 Q. When did you change your mind to not feel  
3 comfortable? You just testified that you did feel  
4 comfortable?  
5 **A. But I wanted to have my father there. I wanted**  
6 **my father there with me. I wanted somebody there that I**  
7 **knew was going to protect me and on my side.**  
8 MS. DIBIANCA: Let's read the record back  
9 for a moment. I want to scroll back to the part of the  
10 record where she testified about she was not comfortable  
11 dropping them off, but she would have been comfortable  
12 bringing them with her the next day.  
13 (The record was read:  
14 Q. Would you have brought them to the  
15 meeting on the 10th had he asked you?  
16 **A. Yes.**  
17 Q. Why? What would have been the  
18 difference?  
19 **A. Well, they would have been in my**  
20 **possession. I would have been right there.**  
21 Q. You would have been comfortable with  
22 that?  
23 **A. Sure.**  
24 Q. What about the diary and notes, did he

9 (Pages 278 to 281)

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1 ask you to bring those?  
2 **A. And my father was also going to be**  
3 **there.**  
4 **No. He may have. But he didn't ask me to**  
5 **bring anything. When I left on Wednesday he didn't**  
6 **ask me to bring anything.)**  
7 **BY MS. DIBIANCA:**  
8 Q. So is that answer now different? Are you saying  
9 that you would not have for some reason felt comfortable  
10 bringing the tapes with you?  
11 **A. I decided not to. I decided to take a whole new**  
12 **recorder, and I recorded that meeting that morning from**  
13 **the moment I walked in, all of our names, just as you do**  
14 **when we all join together here, and I set it down.**  
15 **And he got very upset, which it is all on**  
16 **tape, not wanting the recorder on, saying about none of**  
17 **my business about Randolph. He doesn't -- hey, he lied**  
18 **to me and I knew what they were doing, so that's what I**  
19 **did. I did bring a tape recorder, but I brought one that**  
20 **was ready just for him.**  
21 Q. But you did not bring the tape --  
22 **A. No, I did not.**  
23 Q. You did not --  
24 **A. No, I did not.**

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1 Q. I'm going to have to finish my question. Did you  
2 bring the tapes with you to the meeting on the 10th that  
3 had what you claim to be evidence in support of your  
4 allegations?  
5 **A. No, I did not. The meeting was not supposed to**  
6 **be at 6:00 o'clock in the morning. The meeting was**  
7 **supposed to take place when my father came down, and we**  
8 **were trying to confirm a time, and Jerry Downie changed**  
9 **his mind and said, "I do not want to meet with your**  
10 **father."**  
11 **He doesn't have time. His schedule is too**  
12 **busy. So, therefore, I did not bring nothing. I brought**  
13 **nothing but a blank tape recorder to tape record him.**  
14 Q. When did you first find out that your father was  
15 not going to be present at the meeting?  
16 **A. Jerry Downie didn't want him to come down that**  
17 **day.**  
18 Q. When did you first find that out?  
19 **A. That morning.**  
20 Q. That morning, the morning of the 10th?  
21 **A. Yes, or, no. Wednesday, when I adjourned the**  
22 **meeting, I said, "This meeting is over," and I walked**  
23 **out. That's why they followed me, on Wednesday. I said**  
24 **to him, I said, "You said I could have my father with**

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1 **me." So I think it was Wednesday that I first -- I'm not**  
2 **sure.**  
3 Q. But when did you find out that your father was  
4 not going to be in the meeting, that Mr. Downie said he  
5 did not have time, you said?  
6 **A. Yes. I don't know. That may be on one of my**  
7 **tapes. So it was Wednesday or Thursday morning.**  
8 Q. Well, that's exactly what I'm trying to find out.  
9 **A. I think it was Wednesday.**  
10 Q. When would you have found out Wednesday?  
11 **A. When I walked out of the meeting. When I walked**  
12 **out. I walked out. I said, "This meeting is over."**  
13 Q. Okay. And at that point you were willing to  
14 bring the tapes with you the next day; is that correct?  
15 **A. No. He never mentioned the tapes that day.**  
16 **That's the day he said he did not want to reach those**  
17 **channels.**  
18 Q. By Wednesday night when you spoke with him you  
19 were not willing to drop them off, but you were willing  
20 to bring them the next day; is that correct?  
21 **A. He said, "If you feel comfortable."**  
22 Q. Is that correct? You were willing to do that?  
23 **A. He didn't me if I was willing.**  
24 Q. I'm asking you: Were you willing at that time?

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1 **A. Was I willing to what?**  
2 Q. You can't speak over me because the court  
3 reporter can't take that down. We have to take turns.  
4 **A. Okay.**  
5 Q. I'm asking you, after you spoke with Mr. Downie  
6 on the phone Wednesday evening, at that time were you  
7 willing to bring the tapes with you the next day? You  
8 testified that you changed your mind at some point?  
9 **A. He didn't ask me. He didn't ask. He said, "If**  
10 **you feel comfortable."**  
11 Q. Right. I got that. Now, when he said, "If you  
12 feel comfortable," at that time in your mind, did you  
13 decide to bring the tapes at that point?  
14 **A. To myself?**  
15 Q. Yes. To yourself, not to him. Exactly.  
16 **A. I went and got a whole brand-new tape recorder.**  
17 Q. But what about the tapes that already existed?  
18 **A. No, I wasn't letting him nowhere near them at**  
19 **that time moment.**  
20 Q. That's what I'm asking you. You testified you  
21 changed your mind. I'm trying to find out at what point  
22 did you first say to yourself I am willing to bring them,  
23 and then at what point did you change your mind to no, I  
24 am not willing to bring them?

10 (Pages 282 to 285)



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1 **A. Somewhere on 95 I guess.**  
2 Q. When was that? After leaving the EEOC?  
3 **A. Mm-hmm, yes.**  
4 Q. But at this point you did not know -- my  
5 understanding is that you were expected to bring the  
6 tapes?  
7 **A. He didn't expect anything.**  
8 Q. Or was willing to let you bring the tapes?  
9 **A. What do you mean?**  
10 Q. I mean --  
11 **A. He said, "If you feel comfortable bringing them,**  
12 **you can."**  
13 Q. At that point --  
14 **A. I wasn't.**  
15 Q. Okay. When were you willing to bring the tapes?  
16 **A. I don't know. I don't, I don't know. He started**  
17 **switching up. If you are chasing me around and making me**  
18 **leave my office, why should I bring something? Why**  
19 **should I keep my word, you know, or let you hear anything**  
20 **if you are chasing me around and going to throw me off**  
21 **your property anyway.**  
22 Q. Did you at any point consider producing the tapes  
23 to Mr. Downie?  
24 **A. Well, at one point.**

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1 Q. What point --  
2 **A. Not when my father -- I don't know.**  
3 Q. Do you know for certain --  
4 **A. If my father was going to be there on Thursday,**  
5 **yes, I would have.**  
6 Q. I'm going to repeat my instruction that you  
7 cannot interrupt my question and you cannot speak over  
8 me. Otherwise, we can't get a clear record.  
9 **A. Okay.**  
10 Q. Okay. At what point were you willing to produce  
11 the tapes to Mr. Downie?  
12 **A. When we all were going to meet for Thursday.**  
13 Q. What day was that?  
14 **A. My father was going to be there. The 10th.**  
15 Q. On the 10th you were willing to produce the  
16 tapes?  
17 **A. No. Actually from the first day I told him.**  
18 **They could have heard the tapes at any given time. But I**  
19 **wanted my father with me.**  
20 **But when they started changing things**  
21 **around, when they called Randolph Harris Tuesday night,**  
22 **brought him in, then didn't call me until 11:30 on**  
23 **Wednesday, the 9th, followed me around, had called me in**  
24 **two offices, they don't want to reach these channels of**

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1 **hearing the tapes, lati-dati, then they wanted me to come**  
2 **directly to his office, once they started lying and**  
3 **changing everything around, I knew what they were doing.**  
4 **So, no, I wasn't dropping off tapes.**  
5 **And sure, I would have loved to let them**  
6 **hear them as long as my -- they kept their word and my**  
7 **father could have been by my side. Does that answer**  
8 **everything yet?**  
9 Q. Not quite. Did you tell the EEOC intake officer  
10 about the tapes?  
11 **A. Yes.**  
12 Q. Did you tell the intake officer about the diary  
13 or notes?  
14 **A. Yes.**  
15 Q. Were you willing to share the diary with them?  
16 **A. I did.**  
17 Q. You did share the diary with them?  
18 **A. Mm-hmm.**  
19 Q. You had it in your possession on the 9th?  
20 **A. Yes, I went home and got everything.**  
21 Q. Okay. You testified earlier that --  
22 **A. Or, no, no. I'm sorry. You are right. That may**  
23 **have been on the 29th. I'm pretty sure I took everything**  
24 **up there. But, see, I don't think I knew at the**

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1 **beginning you had to be screened. I think I just went up**  
2 **there. Because on the 7th I talked to a Mrs. Smith, and**  
3 **she was trying to tell me, you know, how to protect**  
4 **myself, and I didn't know what to do, you know.**  
5 **But I just knew I was sick of Randolph**  
6 **Harris, and once he didn't show up for work on Tuesday,**  
7 **April the 8th, I knew I felt comfortable telling, so I**  
8 **just --**  
9 Q. Did you tell the EEOC intake officer on the 9th  
10 that you had the tapes?  
11 **A. Yes.**  
12 Q. And did you share the tapes with him at that  
13 time?  
14 **A. I don't think on the 9th. It was the 29th when**  
15 **they had me come back.**  
16 Q. And you shared the tapes with them on the 29th.  
17 **A. Yes.**  
18 Q. With Miss, I believe her name is pronounced  
19 Wjasow or --  
20 **A. W-J-A-S or W-Z.**  
21 Q. A strange spelling, yes.  
22 **A. Elizabeth something.**  
23 Q. And you did share them with her?  
24 **A. Yes. Or -- yes. And I think that was before I**

11 (Pages 286 to 289)

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1 sent a copy. But, yes, I let her listen to them, and she  
2 was appalled.  
3 Q. Did you play the tapes with her present?  
4 A. Yes.  
5 Q. And why were you comfortable playing the tapes in  
6 front of Miss Wjasow and not in front of Mr. Downie or  
7 Mr. Ryan?  
8 A. I knew she wouldn't attack me or try to take  
9 them.  
10 Q. But you subsequently learned that the EEOC was  
11 liars; isn't that correct?  
12 A. Liars?  
13 Q. That's what you testified to last time?  
14 A. They ended up, they ended up being liars.  
15 Q. So you learned that later?  
16 A. Well, if they came down to CitiSteel grounds  
17 physically, with their feet, like they said they were  
18 going to, then forgive me for calling them a liar.  
19 Q. Miss Wjasow?  
20 A. Anyone. Whomever was supposed to come down.  
21 Nobody from EEOC came down to CitiSteel. Nobody walked  
22 around there.  
23 Q. So Miss Wjasow did lie about her investigation?  
24 A. Well, if she is the one that was supposed to walk

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1 on the grounds, I guess so.  
2 Q. What about the diary and the notes, did you bring  
3 them to the meeting on the 10th?  
4 A. On the 10th?  
5 Q. Yes.  
6 A. No.  
7 Q. Why not?  
8 A. I didn't. What did he want to meet with me for  
9 at 6:00 o'clock in the morning without my father, if they  
10 begged me to go home Wednesday and wouldn't let me go  
11 back to my office, what were they going to do with me  
12 Thursday morning?  
13 What do you think they would have did with  
14 you, if they followed you around on Wednesday and begged  
15 you to go home and sleep on things, would not let you go  
16 back to your office to do your job, why would they want  
17 you or why, should I say why would they let you go back  
18 and do your job Thursday if, after saying come directly  
19 to my office at 6:00 a.m. in the morning.  
20 My father wasn't going to be able to be  
21 there at 6:00 a.m. in the morning. He decided he didn't  
22 want to meet with my father, his schedule was too busy.  
23 Q. When did you find out the meeting was going to be  
24 at 6:00 a.m.?

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1 A. When, the day, I finally, I'm sitting there  
2 staring at him when he is going like this, "Please keep  
3 the dust down." (Indicating)  
4 Q. Which day, 9th or 10th?  
5 A. The 9th he was saying he wanted to keep the dust  
6 down, doing all this with his hands down to the ground.  
7 Q. When did you find out the meeting was going to be  
8 a meeting at 6:00 a.m.?  
9 A. It wasn't a meeting. He said, "You report to my  
10 office before -- report directly to me before you go up  
11 to your office."  
12 Q. And then so it was not supposed to be a meeting  
13 on the 10th, right in the morning?  
14 A. Not in the morning.  
15 Q. Okay. But when you got there, then he did want  
16 to talk to you about it, Mr. Downie?  
17 A. No, he gave me an ultimatum.  
18 Q. The resign or the transfer?  
19 A. Yes.  
20 Q. Okay.  
21 A. It is all on tape so you can listen to it.  
22 Q. So why did you not bring the diary and the notes  
23 with you if you thought there was going to be a meeting  
24 on the 10th?

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1 MS. BREWINGTON: Objection, asked and  
2 answered.  
3 Q. Go ahead. You can answer.  
4 A. I didn't feel like that was a meeting at 6:00  
5 a.m. in the morning.  
6 Q. But there was supposed to be a meeting later?  
7 A. Sure.  
8 Q. So why didn't you bring them for the meeting  
9 later?  
10 A. No, no, no, no. You mean the meeting later on in  
11 the day?  
12 Q. Yes.  
13 A. Oh, well, I just didn't take them in his office.  
14 Q. But you had them on the property?  
15 A. Oh, yes, I had everything.  
16 Q. You had the tapes and the diary or notes; is that  
17 correct?  
18 A. I'm pretty sure I put them, I carried -- I have  
19 this big briefcase filled with everything, so other than  
20 that I would have went home and got them at lunch. I  
21 don't really recall. But I knew that I wasn't going to  
22 have a full pleasant day at CitiSteel on the 10th.  
23 That's why I took a blank tape recorder there.  
24 Q. You remember bringing a blank tape recorder?

12 (Pages 290 to 293)

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1 **A. Yes.**  
2 Q. But you don't recall if you brought the tapes  
3 that were your, quote, smoking gun, if I can say those  
4 words?  
5 **A. My spoke smoking gun?**  
6 Q. Your evidence.  
7 **A. Whoever said smoking gun?**  
8 Q. I'm saying that for the first time. Your  
9 evidence. You don't recall bringing them?  
10 **A. No.**  
11 Q. And the notes, you do not recall bringing them  
12 either; is that correct?  
13 **A. Correct.**  
14 Q. Who was present at the meeting you attempted to  
15 tape?  
16 **A. Mr. Downie and Jim Ryan and myself.**  
17 Q. Okay. And why did you attempt to tape that  
18 meeting?  
19 **A. Because my father wasn't with me and I needed**  
20 **some kind of proof.**  
21 Q. Okay. And --  
22 **A. Why did he call, suddenly want me in there at**  
23 **6:00 o'clock in the morning after following me around and**  
24 **wouldn't let me go back to my office?**

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1 Q. You believe?  
2 **A. Yes, ma'am.**  
3 Q. How did Mr. Downie and Mr. Ryan respond to your  
4 attempt to tape the meeting?  
5 **A. Mr. Downie was upset. And Mr. Ryan never said**  
6 **one word.**  
7 Q. Did Mr. Downie indicate he was upset?  
8 **A. He didn't want it taped.**  
9 Q. Why?  
10 **A. I don't know. He wouldn't answer me. I said,**  
11 **"Why not? What is the big deal?" I said, "EEOC told me**  
12 **I can do so."**  
13 Q. Who told you at the EEOC?  
14 **A. Who told me I could do that?**  
15 Q. Yes.  
16 **A. No, no, I'm sorry. It was a lawyer actually. I**  
17 **called a lawyer up, out of the blue, out of a book, and**  
18 **asked a bunch of questions.**  
19 Q. What was that lawyer's name?  
20 **A. I don't recall.**  
21 Q. When did you call the lawyer?  
22 **A. I think Monday also as well, when I called EEOC.**  
23 **But they may have also told me that, you**  
24 **know, I'm allowed to tape the conversation. And**

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1 Q. You taped the 6:00 a.m. meeting?  
2 **A. Yes.**  
3 Q. Okay.  
4 **A. I'm sorry, it may have been 6:30.**  
5 Q. That's fine. I just want to get a general idea  
6 of the time frame.  
7 So you brought the tape recorder with the  
8 blank tapes because you thought that he was going to  
9 deceive you in some way? I'm trying to understand why.  
10 **A. Because of what they did on Wednesday, that's**  
11 **why.**  
12 Q. What did you think they were going to do on  
13 Thursday?  
14 **A. Not let me go back to my office and give me an**  
15 **ultimatum, and I knew I wasn't accepting either because I**  
16 **did nothing wrong.**  
17 Q. Did you think that there was a conspiracy between  
18 them? Do you think they had made decisions ahead of time  
19 without you?  
20 **A. I knew that they were not going to let me go back**  
21 **to my office, yes.**  
22 Q. And that was a decision they had made before you  
23 got there, you believe?  
24 **A. Yes, ma'am.**

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1 **especially if they are doing nothing wrong, they**  
2 **shouldn't have been opposed to it. They should have no**  
3 **problem being recorded if they were doing nothing wrong.**  
4 Q. But where you asked a bunch of questions too, was  
5 that a Delaware attorney?  
6 **A. I'm sure it was.**  
7 Q. Did you meet with him or her in person?  
8 **A. No. No.**  
9 Q. Was it a he or a she?  
10 **A. Actually, I asked a secretary, and then -- well,**  
11 **I spoke -- I don't know exactly what I asked the**  
12 **secretary. I spoke to a secretary for awhile, or a**  
13 **paralegal, whatever, whatever she is, and then a**  
14 **gentleman got on the phone.**  
15 Q. And you spoke with him and you believe he was an  
16 attorney?  
17 **A. Yes.**  
18 Q. Was there any charge for that phone call?  
19 **A. What do you mean?**  
20 Q. Did you submit or remit any kind of payment to  
21 the attorney?  
22 **A. Oh, no.**  
23 Q. So he gave you free legal advice on the phone; is  
24 that correct?

13 (Pages 294 to 297)

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1 **A. Mm-hmm, yes.**  
2 Q. How long was your conversation?  
3 **A. Just a couple moments.**  
4 Q. And during that conversation the attorney or the  
5 secretary told you that you could tape record a  
6 conversation with a third person?  
7 **A. Well, actually, I also knew in advance.**  
8 Q. But answer the question.  
9 **A. I'm sorry. What was your question again?**  
10 Q. The question was: Did a lawyer and/or a  
11 secretary tell you you could tape record the  
12 conversation?  
13 **A. Yes. Well, actually a couple people did.**  
14 Q. Which one at this time, the lawyer and/or the  
15 secretary?  
16 **A. I don't recall.**  
17 Q. And you don't recall the lawyer's name; is that  
18 correct?  
19 **A. Not at this moment, I don't.**  
20 Q. Were you represented at that time by Mr.  
21 Neuberger?  
22 **A. No, ma'am.**  
23 **But also, I was informed that you may tape**  
24 **anyone as long as there is one willing party and the one**

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1 **willing party, all that it really has to be is yourself,**  
2 **so --**  
3 Q. Who told you that?  
4 **A. I don't recall. I've asked many questions**  
5 **because I didn't know what to do about Randolph and I**  
6 **knew he would never admit.**  
7 Q. You said several people told you that? Let's  
8 hear some of the several.  
9 **A. I don't know. I would just, you know, make phone**  
10 **calls and ask questions.**  
11 Q. To whom?  
12 **A. Sporadically.**  
13 Q. To whom?  
14 **A. Just legal advice, so forth.**  
15 Q. To whom?  
16 **A. I don't know.**  
17 Q. You made --  
18 **A. No one in particular.**  
19 Q. You made several phone calls to several people on  
20 several occasions to get legal advice, but you cannot  
21 recall any of those people or any of the occasions; is  
22 that correct?  
23 MS. BREWINGTON: Objection, mischaracterizes  
24 testimony.

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1 **A. Correct.**  
2 Q. That's correct?  
3 **A. I would just open the phone book.**  
4 Q. And look for whom?  
5 **A. Just called numbers. Dialed numbers.**  
6 Q. Domino's Pizza, for example?  
7 MS. BREWINGTON: Objection.  
8 **A. Sure.**  
9 Q. That's what I'm asking you. I want to know, what  
10 are you looking for in the phone book to call?  
11 **A. I wanted just somebody to help me figure out how**  
12 **I protect myself.**  
13 Q. Where are those people listed in the phone book?  
14 **A. Well, I'm not sure. Well, I guess under A,**  
15 **attorney, or L for lawyer. I just would browse around.**  
16 Q. That's what I'm asking. It is an attorney?  
17 **A. Like if you need a windshield you call around and**  
18 **you ask questions, like that.**  
19 Q. And lawyers gave you legal advice via the phone;  
20 is that correct?  
21 **A. Yes. I asked questions and they would just**  
22 **answer basically yes or no. But a lot of times I think**  
23 **it was a secretary or a paralegal. I really don't know**  
24 **the difference.**

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1 Q. During our last session last week you testified  
2 that the first time you sought legal counsel was Mr.  
3 Neuberger, so is that statement still correct?  
4 **A. Yes.**  
5 Q. Did you ask the advice of other attorneys before  
6 you sought counsel from Mr. Neuberger?  
7 **A. No.**  
8 Q. How would you characterize these several  
9 conversations on several occasions with several different  
10 people?  
11 **A. I'm sorry, I'm not following you.**  
12 Q. How would you characterize these phone calls when  
13 you looked up people in the Yellow Pages?  
14 **A. What do you mean by characterize?**  
15 Q. Would you characterize them as legal counsel,  
16 seeking legal counsel?  
17 **A. Just somebody trying to help me. Because I**  
18 **didn't have anybody.**  
19 Q. Was Mr. Neuberger trying to help you?  
20 **A. Well, I didn't know him at that time.**  
21 Q. But I'm just trying to determine, you testified  
22 that Mr. Neuberger was the first legal counsel you  
23 sought.  
24 **A. Yes.**

14 (Pages 298 to 301)



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1 Q. Now, today I'm hearing that there were several  
2 attorneys involved, and I'm trying to clarify as to which  
3 statement is accurate.  
4 MS. BREWINGTON: I'm going to object. That  
5 mischaracterizes her testimony.  
6 Q. You can go ahead and answer.  
7 **A. As far as seeking legal counsel, yes. Neuberger.**  
8 **But as far as calling up and asking questions, I never**  
9 **met Neuberger until after August.**  
10 Q. But were you asking legal questions?  
11 **A. Well, I guess, if that's what you want to**  
12 **consider legal questions. Am I allowed to do this, you**  
13 **know, and --**  
14 Q. What other kind of questions were there?  
15 **A. Well, actually none. Just really about the**  
16 **tapes. I needed some kind of proof.**  
17 Q. Did you tell Mr. Downie you turned the tape  
18 recorder off?  
19 **A. Yes. Well, no. He was asking me to. And then**  
20 **he -- you can hear, I stopped, paused it for a second,**  
21 **but I turned it right back on, and you can hear him**  
22 **asking me if it is still on.**  
23 Q. Did you --  
24 **A. Yes, I did.**

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1 MS. BREWINGTON: What was the question?  
2 MS. DIBIANCA: I didn't ask a question. I  
3 just said "Did you."  
4 MS. BREWINGTON: Did you know what she was  
5 going to say? I didn't know what you were going to say.  
6 MS. DIBIANCA: I didn't know what I was  
7 going to say either.  
8 MS. BREWINGTON: But you knew.  
9 BY MS. DIBIANCA:  
10 Q. Now I have to put it in words. Did you tell Mr.  
11 Downie you had turned it off, turned the tape recorder  
12 off?  
13 **A. Probably -- maybe. I may have. You can listen**  
14 **to it. You will probably hear whether I --**  
15 Q. I'm just asking you.  
16 **A. I don't recall.**  
17 Q. Mr. Downie, he did ask you to turn it off; is  
18 that correct?  
19 **A. Yes.**  
20 Q. And you did not turn the tape off, stop  
21 recording; is that correct or --  
22 MS. BREWINGTON: Objection, asked and  
23 answered.  
24 **A. No, I did for a second.**

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1 Q. You did turn it off for a second?  
2 **A. One second.**  
3 Q. And then you turned it back on?  
4 **A. Yes, ma'am.**  
5 Q. Did you tell him you were turning it back on?  
6 **A. No, ma'am.**  
7 Q. Did you pretend to have it turned off?  
8 **A. I didn't pretend anything. He just kept on**  
9 **talking, I kept on talking back. And then a few moments**  
10 **later he said, "Is the tape recorder still on?" And I**  
11 **said, "Yes, it is."**  
12 Q. What did he say?  
13 **A. He said -- we can listen to it. He said, "I**  
14 **don't want to be recorded." And I said, "Well, why not?"**  
15 **I said, "That's too bad." I said, "I already know that**  
16 **I'm allowed to tape this."**  
17 **Whatever, whatever is on there. We can**  
18 **listen to it. I can't recall.**  
19 Q. I don't want to listen to it. I want you to tell  
20 us.  
21 **A. Well, I can't remember every single word. I**  
22 **can't remember things that happened 20 years ago.**  
23 Q. You can't?  
24 **A. Not everything.**

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1 Q. Is this 20 years ago?  
2 **A. No, but I think you expect everybody's mind to**  
3 **remember every little single word or page number and**  
4 **detail. And I do not, so...**  
5 Q. So you are having some inability to recall the  
6 details of this discussion?  
7 **A. The exact word for word.**  
8 MS. BREWINGTON: Okay. Off the record one  
9 second.  
10 (Discussion off the record.)  
11 BY MS. DIBIANCA:  
12 Q. So is your memory clear as to the events of this  
13 meeting on the 10th?  
14 **A. Somewhat, yes.**  
15 Q. Yes?  
16 **A. Yes.**  
17 Q. Did you pretend to turn the tape off?  
18 MS. BREWINGTON: I'm going to object.  
19 **A. He asked me to --**  
20 MS. BREWINGTON: Asked and answered. But  
21 she can go ahead, certainly.  
22 **A. Well, you asked me that once, and I guess I'll**  
23 **answer again. He asked me to turn it off, and I did so**  
24 **for a second, and I turned it right back on.**

15 (Pages 302 to 305)

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1 Q. Okay. Did he know that you turned it right back  
2 on?  
3 **A. I don't think so. I don't know. I don't know**  
4 **what he knew.**  
5 MS. DIBIANCA: All right. Let's admit next,  
6 we will do Snyder 12.  
7 (Snyder Deposition Exhibit 12 was marked for  
8 identification.)  
9 BY MS. DIBIANCA:  
10 Q. Have you seen this --  
11 **A. Yes.**  
12 Q. Have you seen this before?  
13 **A. Yes, ma'am.**  
14 Q. What is it, in your own words?  
15 **A. It looks like a piece of paper with my**  
16 **handwriting.**  
17 Q. Do you recall when you wrote this?  
18 **A. Yes, but I think I've had to rewrite several**  
19 **things several times for different people. So, yes, it**  
20 **was my rebuttal.**  
21 Q. To the position statement of respondent at the  
22 time of CitiSteel?  
23 **A. Yes. I assume so. Like I said, I had to write**  
24 **several things, several times.**

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1 Q. You had to rewrite this document?  
2 **A. I thought I had to write two rebuttals, so --**  
3 Q. Two rebuttals to whom?  
4 **A. I don't recall. I don't know.**  
5 Q. Would there have been another --  
6 **A. I --**  
7 Q. Go ahead.  
8 **A. I thought from Richards, Layton & Finger as well.**  
9 **I don't know, I am assuming this is from**  
10 **EEOC. This one here in my hand, Snyder 12.**  
11 Q. Yes. I believe that this was, let's see, this  
12 was submitted to the EEOC. If you see on the very front  
13 page there, page 1 of Snyder 12, there is a date stamp at  
14 the top where it says "Received EEOC Philadelphia."  
15 **A. Okay, yes.**  
16 Q. Okay. Did you write another document similar to  
17 this, you think?  
18 **A. I thought I may have. I don't know. I know this**  
19 **one was 30 some pages.**  
20 Q. Do you remember writing another document that  
21 would have been 30 pages or more?  
22 **A. No, I guess not.**  
23 Q. Let's look at the top of page 30. Snyder  
24 Exhibit 12, page 30, also marked as D311. Let me know

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1 when you are there.  
2 **A. It is marked what?**  
3 Q. 30.  
4 **A. Snyder Exhibit page 030.**  
5 Q. Yes. The first sentence at top it says, "As far  
6 as the meeting," could you read that sentence, please?  
7 **A. "As far as the meeting on the morning of 4/10/03**  
8 **- the entire meeting I have on tape - when Downie begged**  
9 **me to turn it off - I pretended - I hit the button and**  
10 **immediately hit it again."**  
11 **In other words, to turn it back on.**  
12 **"You can hear him asking me that as well."**  
13 Q. Okay. So you did, in fact, this document does  
14 say that you pretended to turn the tape off; is that  
15 correct?  
16 **A. Well, I, like it also says, I did hit it, I**  
17 **turned it off, but then I turned it right back on.**  
18 Q. Does it say you pretended to turn it off?  
19 **A. Yes.**  
20 Q. Okay. I just thought that might help since you  
21 cannot recall.  
22 **A. Thank you. It did very much.**  
23 Q. Let's go to page 17 on the same exhibit. There  
24 is some discussion there by you regarding the tapes and

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1 diary, and Mr. Downie's request for you to produce those  
2 tapes and diaries. Why don't you have a look at that and  
3 then we can talk about it.  
4 **A. Yes.**  
5 Q. Does this help you recollect this time period?  
6 **A. Yes. I said that earlier. I offered to run down**  
7 **to my mom's, mm-hmm.**  
8 Q. And then at the bottom, almost the very bottom of  
9 the page there is a Bates stamp there that says 298 on  
10 the right-hand side. Do you see that?  
11 **A. D298, yes.**  
12 Q. The sentence right above that it says, "On my way  
13 back - she informed me Downie called 3 times looking for  
14 me from 3 different extensions," maybe.  
15 **A. Oh, okay. Yes, ma'am.**  
16 Q. And then the next sentence reads what starting "I  
17 called"?  
18 **A. "I called," is that what where you want me to**  
19 **begin?**  
20 Q. Yes, please.  
21 **A. "I called him and he said, 'If you want bring**  
22 **your evidence (tapes) to me tomorrow morning, which prior**  
23 **to finally leaving on 4/9, before coming there, EEOC, he**  
24 **also begged me not to come to work until 8:00 a.m., to**

16 (Pages 306 to 309)

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1 **come directly to HR," I thought I met with him first**  
2 **thing in the morning.**  
3 Q. I mean, the time frame is not necessarily  
4 relevant, but as far as him asking you to or, I'm sorry,  
5 not asking you but saying, "If you want to bring your  
6 evidence (tapes) to me tomorrow morning," is that what  
7 you recall him saying to you on the phone that evening?  
8 **A. Yes. And you know what, also, I apologize. I**  
9 **also recall him saying he doesn't get there that early.**  
10 **That's correct. So I am wrong.**  
11 Q. Okay. That's fine. So at that time, now seeing  
12 this, maybe it does in fact help you recollect --  
13 **A. Yes.**  
14 Q. -- do you recall what your response was to him at  
15 that time? When he said, "If you want to bring your  
16 evidence (tapes) to me tomorrow morning," do you recall  
17 what your response was to him at that time?  
18 **A. No, I don't.**  
19 Q. Do you recall what your thinking was at that  
20 time, whether you would, in fact, bring the tapes?  
21 **A. No. I didn't really, truthfully didn't want to**  
22 **tape them the way they were behaving without my father**  
23 **being there. So...**  
24 Q. Okay. And then as far as the EEOC goes, when was

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1 the first time you told the EEOC about the tapes? Was  
2 that the 29th, did you testify?  
3 **A. Well, I probably told them on the 9th.**  
4 Q. You probably told them first on the 9th and then  
5 actually let them listen to the tapes later?  
6 **A. Yes.**  
7 Q. What was the circumstances of playing the tapes  
8 back for them? Were you at the EEOC at that time?  
9 **A. Yes.**  
10 Q. Who were you with? Who was present at that time?  
11 **A. Miss Wjasow.**  
12 Q. Anyone else in the room?  
13 **A. No.**  
14 Q. Did she ask you to bring the tapes?  
15 **A. I assume. I can't remember.**  
16 Q. And you had no problem producing the tapes to her  
17 and letting her listen to them?  
18 **A. I played them for her. Yes.**  
19 Q. Under protest, or you were willing to do that?  
20 **A. No, no. I was willing.**  
21 Q. At the meeting on the 10th with Mr. Downie, did  
22 Mr. Downie tell you he did not believe your allegations?  
23 **A. No.**  
24 Q. Did he tell you that he believed Harris?

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1 **A. I don't think he really said anything about that.**  
2 Q. Did he ever tell you that he didn't believe you?  
3 **A. No, he never said he didn't believe me.**  
4 Q. The day before, on the 9th, did he say he was  
5 giving you the benefit of the doubt or he did believe  
6 you, something to that effect?  
7 **A. He was giving me the benefit of the doubt in the**  
8 **beginning. On the 8th he slammed his hand on the desk**  
9 **and said, "He better, he better admit this, admit to**  
10 **this."**  
11 Q. Mr. Harris should admit to it?  
12 **A. Yes.**  
13 Q. And Mr. Downie was the one who slammed his hand  
14 down?  
15 **A. Yes.**  
16 Q. On page 14 of this Snyder 12, at the very bottom  
17 of the page there is a bullet and it says in capital  
18 letters, you wrote the word "True," T-R-U-E, do you see  
19 that?  
20 **A. Yes.**  
21 Q. What follows that?  
22 **A. "I yelled - I cursed - and the one time I punched**  
23 **at his hand after squeezing me."**  
24 Q. And do you know what this is referring to?

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1 **A. I guess when I hit him.**  
2 Q. When you hit Mr. Harris?  
3 **A. Yes. The way I did this -- sorry for**  
4 **interrupting -- was I, like the package from EEOC --**  
5 Q. The position statement?  
6 **A. Yes. So I would just, see, because you can't see**  
7 **the question, so then I would just write in the answer,**  
8 **so yes.**  
9 Q. We can actually do that in a little more detail  
10 after the break, but when you said that, yelled and  
11 cursed and punched, could that have been during the  
12 meeting on the 9th, did you yell?  
13 **A. Mr. Harris?**  
14 Q. No, no. Did you yell and curse and punch during  
15 the meeting on the 9th?  
16 **A. No. Harris wasn't there. By the time they**  
17 **called me down Harris was down.**  
18 Q. I don't mean did you punch Mr. Harris at that  
19 time. We did talk about that. But this is a separate  
20 incident without Mr. Harris. Were you upset at the  
21 meeting on the 9th?  
22 **A. Well, how could I punch Mr. Harris if he wasn't**  
23 **there? I'm not following you.**  
24 Q. Okay. I understand. I'm not asking you if you

17 (Pages 310 to 313)

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1 punched Mr. Harris. We are talking about a separate  
2 incident. Let me break it out into little pieces so we  
3 are on the same page. You yelled and cursed and punched  
4 Mr. Harris on one occasion; is that correct?  
5 **A. Yes.**  
6 Q. Okay. Now, putting that occasion aside, now we  
7 are at the meeting on April 9th, on Wednesday. Did you  
8 yell or curse at that meeting?  
9 **A. No.**  
10 Q. No?  
11 **A. No.**  
12 Q. Slam your hands on the table during that meeting?  
13 **A. No. Mr. Downie slammed, punched the table on the**  
14 **8th.**  
15 Q. But during the meeting on the 9th, you weren't  
16 physically upset; is that right?  
17 **A. No.**  
18 Q. What about the meeting on the 10th?  
19 **A. No.**  
20 Q. You weren't physically upset there?  
21 **A. No.**  
22 Q. Yelling?  
23 **A. No.**  
24 Q. Cursing?

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1 **A. No.**  
2 Q. Physically violent?  
3 **A. No.**  
4 MS. DIBIANCA: Let's take a break.  
5 (Recess taken.)  
6 BY MS. DIBIANCA:  
7 Q. We are going to go back on the record. During  
8 the break did you discuss this deposition or the case  
9 with your attorney?  
10 **A. No, ma'am.**  
11 Q. Snyder Exhibit 12, the written statement you  
12 submitted to the EEOC, is this statement honest?  
13 **A. Yes.**  
14 Q. If you were under oath at the time that you wrote  
15 this statement would it have been any different?  
16 **A. No.**  
17 Q. Would you stand by this statement today?  
18 **A. Yes, ma'am.**  
19 Q. Would the transfer have affected your salary?  
20 **A. I don't know. I didn't care. I wasn't**  
21 **transferring.**  
22 Q. Was that ever discussed with you?  
23 **A. I don't know. I don't know if he mentioned it or**  
24 **not. I'm sure he did. Maybe he did. It is probably in**

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1 **here.**  
2 Q. Was that a consideration for you?  
3 **A. No, not at all.**  
4 Q. Because why?  
5 **A. Because I didn't want to move. I did nothing.**  
6 Q. Are there any witnesses to your allegations  
7 regarding Mr. Harris' behavior?  
8 **A. Of course not.**  
9 Q. Did you ever give Mr. Downie any evidence other  
10 than your verbal word to support your allegations against  
11 Mr. Harris?  
12 **A. No.**  
13 Q. What was Mr. Harris' reputation at CitiSteel?  
14 **A. Like did people like him or not?**  
15 Q. Yes.  
16 **A. I guess some of the employees didn't like him.**  
17 **But, you know, he just --**  
18 Q. Did people think he was honest?  
19 **A. I don't what people really thought about him.**  
20 **You know, a lot of people don't like their job and a lot**  
21 **of people complain about their boss. But sometimes**  
22 **bosses is just trying to be a boss and trying to get the**  
23 **production for the company done. So I guess it depends**  
24 **on the individual and how they look at it.**

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1 Q. Did you tell Mr. Harris that he was one of the  
2 nicest bosses ever?  
3 **A. Maybe in the beginning.**  
4 Q. At any time?  
5 **A. I don't remember.**  
6 Q. Would you have told him that?  
7 **A. I don't remember.**  
8 Q. Did you think that?  
9 **A. Well, in the beginning, aren't all bosses nice?**  
10 Q. I'm asking you a question, ma'am. I'm going to  
11 ask that you answer it.  
12 **A. I don't remember.**  
13 Q. You don't remember?  
14 **A. No.**  
15 Q. Okay. If you will look at page 33 of Snyder  
16 Exhibit 12, maybe that will help you refresh your  
17 recollection.  
18 MS. BREWINGTON: Page 33?  
19 MS. DIBIANCA: 33, also marked as D314.  
20 BY MS. DIBIANCA:  
21 Q. The first sentence at the top of the page, ma'am,  
22 what does that say?  
23 **A. Ford?**  
24 Q. Mm-hmm.

18 (Pages 314 to 317)



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1 **A. Do you want me to say his first name or just**  
2 **read?**  
3 Q. You can read the thing and then you can explain.  
4 **A. "Ford was one of the nicest bosses ever - At one**  
5 **time," in a parenthesis, "(soon after employment," EMP,**  
6 **period, "I felt the same about Harris - but his**  
7 **disgusting unprofessional behavior towards me changed**  
8 **that."**  
9 Q. When did you stop thinking that Mr. Harris was  
10 one of the nicest bosses ever?  
11 **A. I guess when he started bothering me.**  
12 Q. Do you have an idea when?  
13 **A. I guess when he started turning my stomach.**  
14 **2002, actually I guess.**  
15 Q. At the meeting on the 10th or on the 9th, if I  
16 have the date wrong, did Mr. Downie tell you that he had  
17 instructed Mr. Harris to never look at or speak to you  
18 again?  
19 **A. Yes.**  
20 Q. He did. And could you elaborate on that for me a  
21 little bit?  
22 **A. That's what he told me.**  
23 Q. Did he say why?  
24 **A. No. I don't recall.**

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1 Q. Okay. So I just want to --  
2 **A. I assume it is because he believed me.**  
3 Q. Okay. Would it have been for your protection?  
4 **A. I would think so.**  
5 Q. Did that make you feel more comfortable in the  
6 work place or less comfortable in the work place?  
7 **A. What, him telling me that he told Randolph not to**  
8 **look at me or speak to me ever again?**  
9 Q. Right.  
10 **A. Yes, and at the same time he wants to ship me to**  
11 **shipping though. So...**  
12 Q. Did you think that that was not an improvement  
13 for Mr. Harris, who you had alleged had harassed you, was  
14 not to have contact with you, was that an improvement?  
15 **A. I think shipping him to shipping would have kept**  
16 **him far away from me, like they were going to try to do**  
17 **to me.**  
18 Q. Well, did you tell Mr. Downie that?  
19 **A. I told him I did not want to go to shipping. I**  
20 **told him I wanted to go back to my office and do my job,**  
21 **yes, I did.**  
22 Q. And did you tell him that, did you tell Mr.  
23 Downie that Mr. Harris should be moved to shipping?  
24 **A. Yes.**

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1 Q. You did?  
2 **A. Yes.**  
3 MS. DIBIANCA: Let's do D40 as Exhibit 13.  
4 (Discussion off the record.)  
5 MS. DIBIANCA: We will move forward. Let  
6 her check it out. Come back to it if we need to. Let me  
7 just mark my place in my notes.  
8 (Discussion off the record.)  
9 BY MS. DIBIANCA:  
10 Q. Now, you testified that you wanted Mr. Harris to  
11 be shipped to shipping, correct, transferred to shipping?  
12 **A. Yes.**  
13 Q. And you told Mr. Downie that, correct?  
14 **A. Yes.**  
15 Q. And did you want him to be fired?  
16 **A. No.**  
17 Q. What if Mr. Downie had told you that that was the  
18 only option, Mr. Harris could be fired or you could be  
19 transferred?  
20 MS. BREWINGTON: Objection. Calls for  
21 speculation. You can answer.  
22 **A. Well, so be it.**  
23 Q. What would you have chosen?  
24 **A. Him being fired.**

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1 Q. Okay.  
2 **A. I still wouldn't have took the transfer.**  
3 Q. Okay. What was your attitude like towards Mr.  
4 Harris?  
5 **A. It was nice. I mean, I treat people the way they**  
6 **treat me.**  
7 Q. Okay.  
8 **A. Until the time went on, people started to act**  
9 **different and do different things so that's going to make**  
10 **you react different to them, and it is going to make your**  
11 **attitude towards them change.**  
12 Q. When did your attitude towards him change?  
13 **A. Well, 2002, you know, it got worse.**  
14 Q. Tell me about it.  
15 **A. Well, even from the very beginning, which I**  
16 **didn't think nothing of it, he had me do personal things**  
17 **for him such as I guess his homework. I got his report**  
18 **home on my computer from November 2001.**  
19 **I sat at home and did a whole report for him**  
20 **on my personal computer. He even had me do it during**  
21 **work hours.**  
22 Q. So that would have been --  
23 MS. BREWINGTON: Wait. Can she finish her  
24 answer?

19 (Pages 318 to 321)

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1 MS. DIBIANCA: She can, she can. She is  
2 actually not being responsive to my question.  
3 MS. BREWINGTON: Oh, okay.  
4 BY MS. DIBIANCA:  
5 Q. My question just is: When did your attitude  
6 become means towards him?  
7 **A. When he started staring, talking nasty and**  
8 **grabbing at me.**  
9 Q. When was that?  
10 **A. It got worse 2002. It was little things here and**  
11 **there. I want to take you out. And then he started**  
12 **asking me about the weekends and things like that. And I**  
13 **just, I started not telling him that I went away.**  
14 **As time went on. There is the answer. I,**  
15 **my attitude just continued to change. I would still do**  
16 **what I was told as an employee. I couldn't stand him.**  
17 Q. What was the change in attitude? How would you  
18 have characterized your attitude after the change?  
19 **A. I couldn't stand him.**  
20 Q. But your attitude towards him?  
21 **A. My attitude towards him, my behavior towards him**  
22 **as long as he stayed professional was fine. But, you**  
23 **know, behind closed doors or when he would say something**  
24 **nasty or stand there and give me that stare, no, my**

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1 **attitude wasn't fine. It was hateful.**  
2 Q. How did you express this hate?  
3 **A. Well, which point? When I hit him?**  
4 Q. That was one example which you gave. What else  
5 would there have been?  
6 **A. Just telling him to get out of my office. Picked**  
7 **up a bag of cough drops -- I was sick. And he just stood**  
8 **there for like, I don't know, 20 minutes eating them, one**  
9 **after another. And just I picked up the bag of cough**  
10 **drops and I slammed them down on my desk and I said,**  
11 **"Just take them all. Get out." I mean, like that type**  
12 **of disposition. You know, he was just standing there**  
13 **staring at me, eating cough drop after cough drop. How**  
14 **pretty you are, you know, so it is going to make you not**  
15 **like somebody.**  
16 Q. So him having the cough drops, was that sexual  
17 harassment?  
18 **A. Standing there staring at me, telling me how**  
19 **pretty I am, and his little chuckles and giggles.**  
20 Q. Is that a yes?  
21 **A. I think that's part of it, yes, because I knew**  
22 **him and I knew what he was doing.**  
23 Q. So let's clarify which part of the cough drop  
24 incident was, in fact, sexual harassment in your opinion.

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1 **A. It was him standing there staring at me.**  
2 Q. While he ate the cough drops? I'm sorry. I'm  
3 sorry.  
4 **A. And he was standing there, and then he would --**  
5 **then he even came back later in the day, why not go two**  
6 **doors down to your office and use your phone, and just**  
7 **standing there staring at me, looking me up and down and**  
8 **telling me how pretty I am.**  
9 Q. So the staring was the part that you felt was  
10 harassment?  
11 **A. Not just staring. Like staring. If you look at**  
12 **me I'll show you like a look.**  
13 Q. I want to get it on the record, so it is going to  
14 be hard for us to get on the record --  
15 **A. You can take my picture along with my voice then,**  
16 **if you would like.**  
17 Q. Okay.  
18 **A. That way you can have the look.**  
19 Q. You can certainly look at me with the look. That  
20 doesn't bother me one bit. However, what I would like to  
21 get is get your words on the record.  
22 **A. I'm trying to give you an example.**  
23 Q. On the record, words on the record --  
24 **A. A nasty look.**

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1 Q. A nasty look. Okay.  
2 **A. Not a mean nasty. A nasty.**  
3 Q. Okay.  
4 MS. BREWINGTON: Can I ask her to describe  
5 what she means? Will that help?  
6 MS. DIBIANCA: If nasty is the description  
7 that you want to stick with, that's fine. I'm  
8 comfortable with that. I just wanted an adjective.  
9 MS. BREWINGTON: Okay.  
10 BY MS. DIBIANCA:  
11 Q. And was this one of the more serious allegations  
12 of harassment?  
13 **A. Well, I think that's more of the least.**  
14 Q. Okay.  
15 **A. But I think, you know, if you stand there and**  
16 **stare at somebody all that time, eat umpteen cough drops**  
17 **over and over, standing there staring at them with that**  
18 **look, as your employee, I'm not going to be able to**  
19 **concentrate and perform my job duties as I normally**  
20 **would.**  
21 Q. How long was he in your office with the cough  
22 drops?  
23 **A. 20 minutes.**  
24 Q. All right.

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20 (Pages 322 to 325)

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1 **A. Maybe a little longer. Give or take.**  
2 Q. Let's look at page 11 of Snyder 12, identified as  
3 D292. If you could just read the first paragraph down to  
4 the first bullet point.  
5 **A. At the very tippy top.**  
6 Q. Yes.  
7 **A. "Maybe compared to all of Harris," I think I**  
8 **forgot an S, should have been Harris's, "actions I have**  
9 **been dealing with - the cough drops weren't as serious.**  
10 **And yes he did come into my office later - picked up my**  
11 **phone," and in a parenthesis, "(why not walk 2 doors down**  
12 **and use your own phone) and said pretty woman - he didn't**  
13 **need to use any phone - he is a fake and a horrible man.**  
14 **I looked up at him and he said not you - I said nothing"**  
15 **-- oh, yes, I remember. When he picked up the phone.**  
16 Q. Let's finish reading first, please. I'm sorry.  
17 **A. "He said not you - I said nothing but asked**  
18 **myself then who in the F were you directing" --**  
19 Q. Please read the words.  
20 **A. "Who in the fuck were you directing that at - no**  
21 **one else was around and if so it was only men up there -**  
22 **but he never would make a comment or attempt to touch me**  
23 **in front of anyone of course - why would." Should have**  
24 **been he, "ask the workers how Harris was in my office too**

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1 much."  
2 Q. Okay. So did you tell Mr. Harris then who in the  
3 fuck were you directing that at?  
4 **A. No, I said it to myself, if you read that.**  
5 Q. Okay.  
6 **A. I asked myself that. When he picked up the**  
7 **phone, there was nobody on the phone. He was just**  
8 **standing there with the phone up to his ear staring at**  
9 **me, and then I heard him say "pretty woman" and I looked**  
10 **up at him and he said, "Oh, I'm not talking to you."**  
11 Q. Okay.  
12 **A. I asked myself that, as you see. See where it**  
13 **says that in that paragraph.**  
14 Q. Yes.  
15 **A. I asked myself. "I said nothing but asked myself**  
16 **then who in the fuck were you directing it to."**  
17 Q. Yes, okay. So do you think there was no one on  
18 the other end of the phone? Is that what you understand?  
19 **A. He never talked to nobody.**  
20 Q. Did you understand that there was, did you  
21 believe there was no one at the other end of the phone?  
22 **A. Yes, I do believe that.**  
23 MS. DIBIANCA: Let's do this as Snyder 13.  
24 (Snyder Deposition Exhibit 13 was marked for

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1 identification.)  
2 BY MS. DIBIANCA:  
3 Q. Now, I'm going to represent to you that what this  
4 is is pieces of the transcript from your Department of  
5 Labor unemployment insurance appeal. This is not the  
6 entire transcript, just parts I'm going to reference,  
7 only because it is such a big transcript to copy. But we  
8 do have the full version here if you need it. This is  
9 Snyder 13.  
10 Let's go to page 18, which is D58. It is  
11 the first actually page past the cover.  
12 Do you recall attending the appeal, the  
13 unemployment insurance appeal?  
14 **A. Yes.**  
15 Q. Who else was there?  
16 **A. John LaRosa.**  
17 Q. Who is that?  
18 **A. That was -- I guess Neuberger was the lawyer.**  
19 **Mr. LaRosa was assistant or lawyer as well. I guess**  
20 **Neuberger owned the firm. He is the one -- I don't know**  
21 **how it works. I don't know.**  
22 Q. Was Mr. Neuberger -- I'm sorry -- Mr. LaRosa  
23 representing you at this time?  
24 **A. Yes.**

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1 Q. Who else was there other than yourself and Mr.  
2 LaRosa?  
3 **A. Jennifer, I can't remember her last name.**  
4 Q. Was she the attorney representing CitiSteel at  
5 the time?  
6 **A. Yes.**  
7 Q. Who else?  
8 **A. The arbitrator or referee, I guess as you call**  
9 **it.**  
10 Q. Anybody else?  
11 **A. No. Jerry Downie didn't show up. And the**  
12 **referee said, "Oh, as always."**  
13 Q. Okay. Line 7 Mr. LaRosa says, "Would there,  
14 would there be any change in pay with this transfer?"  
15 Do you see that?  
16 **A. Yes, ma'am.**  
17 Q. What did you respond?  
18 **A. What do you mean?**  
19 Q. I'm sorry. That's probably not clear. What do  
20 you recall Mr. LaRosa was talking about at the time when  
21 he says "with this transfer"?  
22 **A. I assume he was asking me if there would have**  
23 **been a change of pay in my transfer.**  
24 Q. To the shipping department?

21 (Pages 326 to 329)

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1 **A. Yes.**  
2 Q. And what was your response, line 10?  
3 **A. "When he first said that he" -- you want me to**  
4 **continue on to 11, 12, read the whole thing?**  
5 Q. That would be great.  
6 **A. "When he first said that he wants me to transfer**  
7 **basically he didn't say anything as far as hours or**  
8 **anything. He said that, he said your salary will remain**  
9 **the same. Basically that's all he said about the job.**  
10 **He went straight to money you know."**  
11 Q. And then at line 17 the referee asks you a  
12 question. Could you read 17, 18 and 19?  
13 **A. What was the question?**  
14 Q. The referee starts at 17, if you could read that.  
15 **A. "So he said basically your salary would be, will**  
16 **remain the same; is that correct?"**  
17 Q. And then your response was?  
18 **A. "Yeah, that's all he said about it."**  
19 Q. So does that help you reflect --  
20 **A. Yes, it does very much. You are very helpful.**  
21 **Appreciate it.**  
22 Q. What would be helpful if I could finish my  
23 questions and then you can answer. So I'll say it again  
24 just for the record. Does that help you recollect the

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1 meeting?  
2 **A. Yes, ma'am, very much.**  
3 Q. Now, do you recall whether Mr. Downie talked to  
4 you about whether there would be salary change if you  
5 transferred to shipping?  
6 **A. Yes, ma'am, very much.**  
7 Q. Could you tell us about that?  
8 **A. Tell you what?**  
9 Q. Did Mr. Downie say that there would be no change  
10 in your salary if you transferred to shipping?  
11 **A. No. I guess he did say it would remain the same.**  
12 **But I don't think I cared.**  
13 Q. Okay. And then on the next page, which is 102,  
14 D102, it is referenced on the transcript as page 62,  
15 though, line 2, you are responding there. Could you read  
16 that?  
17 **A. Okay. Well, whatever I'm responding to --**  
18 Q. I can look it up if it is not clear after we read  
19 it.  
20 **A. If you want me to read what it says then I will**  
21 **do so.**  
22 Q. Okay.  
23 **A. Line 2, from Terry Snyder, I reply to whatever**  
24 **question or whatever was said to me, my statement reads,**

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1 **"I figured they would transfer or take some type of**  
2 **behavior action against that man because I didn't do**  
3 **nothing wrong."**  
4 Q. And then Miss Jauffret asks, "Did they ever, did  
5 you ever tell CitiSteel what you wanted done to Mr.  
6 Harris?"  
7 And what was your response to Miss Jauffret?  
8 **A. It says, I responded, "No, once they tried to**  
9 **make me move without telling me why. I said why me? I**  
10 **said transfer him. Why should I transfer me."**  
11 **I think there is a typo there.**  
12 Q. Transcripts, they read really difficult.  
13 When was the first time after you left  
14 CitiSteel, which would have been April 10th, I believe,  
15 okay, when was the first time you sought other  
16 employment?  
17 **A. I guess it was within a week or two, even though**  
18 **I didn't -- I was upset. I kind of like trapped myself**  
19 **in the house a little bit. But then at the same time,**  
20 **you know, I needed a job and I wanted to start, you know.**  
21 **So maybe a week or two.**  
22 Q. Where did you first seek employment?  
23 **A. I don't recall. I have all the faxes.**  
24 Q. Did you bring any documents with you today?

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1 **A. No, I didn't.**  
2 Q. The faxes, have you produced any of those?  
3 **A. No.**  
4 Q. Why not?  
5 **A. Well, when you want them you just say so and I'll**  
6 **give them to you, copies of them.**  
7 Q. Have you turned them over to your attorney at  
8 this point or you are the only person that has them?  
9 **A. I still have them.**  
10 MS. DIBIANCA: Let's go off the record for  
11 one second.  
12 (Discussion off the record.)  
13 MS. DIBIANCA: We are on the record and we  
14 are discussing what documents need to still be produced.  
15 MS. BREWINGTON: Yes.  
16 MS. DIBIANCA: Lori, what is out there?  
17 MS. BREWINGTON: After speaking with Miss  
18 Snyder, we will be producing documents regarding her job  
19 search, specifically faxes.  
20 In addition, we will be producing receipts  
21 from Cynthia Wright and other medical providers for the  
22 past ten years.  
23 Pay stubs from previous employers within the  
24 past ten years have already been provided. All those in

22 (Pages 330 to 333)



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1 her possession have been produced.  
2 All documents in her possession concerning  
3 schools and/or training institutes, including Dawn  
4 Institute and American Driving Academy have been  
5 produced.  
6 Or you don't have them? Is that what you  
7 are saying?  
8 THE WITNESS: No, but I'll sign.  
9 MS. BREWINGTON: Miss Snyder does not have  
10 in her possession a benefits package from the Skelly  
11 Group. If she is to obtain that she will produce that.  
12 And in terms of the IRS form, once we  
13 receive the form from defense we will sign it today so  
14 that you guys can get that.  
15 So we have agreed to allow Miss Snyder to be  
16 redeposed with respect to the additional documents that  
17 we will produce.  
18 MS. DIBIANCA: That's agreeable to CitiSteel  
19 as well.  
20 MS. BREWINGTON: Okay.  
21 BY MS. DIBIANCA:  
22 Q. We are back at job search. So the first time you  
23 sought employment after CitiSteel was when?  
24 **A. I do recall, I actually called -- the first thing**

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1 Q. C-O-L-L-I-N-S?  
2 **A. I-N-S, yes.**  
3 Q. And the other person that you worked with was  
4 Bernie?  
5 **A. Barney.**  
6 Q. Barney.  
7 **A. Well, he is the one, he got me the job originally**  
8 **-- well, he sent me to CitiSteel, because CitiSteel was**  
9 **still using Lotus programs before they started**  
10 **transferring over to Excel, like all the other companies,**  
11 **and so he originally sent me to CitiSteel. Barney did.**  
12 Q. When was the first time you started to work?  
13 **A. I don't recall. I can look at pay stubs.**  
14 Q. Well, you have testified or my understanding is  
15 that you don't have all the pay stubs; is that correct?  
16 **A. No, submitted all the pay stubs.**  
17 Q. That you had?  
18 **A. Yes.**  
19 Q. The pay stubs that you submitted, were they for  
20 every place that you worked subsequent to CitiSteel,  
21 after CitiSteel?  
22 **A. Yes.**  
23 Q. So if I don't have --  
24 **A. As far as --**

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1 **I did was call Bernard Personnel up again, and she had me**  
2 **come in and re-register. I informed her that I needed a**  
3 **job again.**  
4 Q. I'm sorry, I just didn't hear you.  
5 **A. I informed her I needed a job again because the**  
6 **first -- his name is Barney. He is the one that got me**  
7 **the job or sent me to CitiSteel originally, back in 2001.**  
8 **When I re-registered I called the other office and spoke**  
9 **with a Vicky Collins. So I re-registered with her.**  
10 Q. When was that?  
11 **A. The end of April. I'm not exactly sure. She has**  
12 **that documented. She had me come in. I don't know when**  
13 **I made the phone call, but she had me come in soon after**  
14 **the phone call and I had to refill out forms and stuff,**  
15 **so they have a file on me. So they could tell you the**  
16 **exact time and date.**  
17 Q. And then did you get employment through them?  
18 Did they find you work, Bernard?  
19 **A. I can't recall. I don't think so. I kept**  
20 **calling her.**  
21 Q. To follow up?  
22 **A. Yes.**  
23 Q. And what was her name?  
24 **A. Vicky Collins.**

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1 Q. I'm sorry to interrupt. If pay stubs have not  
2 been produced, they don't exist; is that correct?  
3 **A. I should think not. I usually always kept them**  
4 **in -- if you go in Staples and you see one of them little**  
5 **file boxes, some people use them as recipe things such**  
6 **as, I would put them all in there. So everything that**  
7 **was in there is what I handed over.**  
8 Q. Okay. So just to be clear -- I'm sorry if this  
9 is repetitive -- all, every place that you worked after  
10 CitiSteel, up until let's say at least 2005, I don't want  
11 to say until today, but until 2005, 2005, you kept all  
12 the pay stubs for that and have produced them; is that  
13 correct?  
14 **A. Yes. I hope I produced them.**  
15 Q. Well, that's what I'm asking.  
16 **A. I'm pretty sure I did.**  
17 Q. I mean, I do recall seeing some documents from  
18 Bernard Personnel. I don't know if that was before  
19 CitiSteel, like the first when you became a temp maybe at  
20 CitiSteel or after. But they were in there. There were  
21 some.  
22 **A. I know I did do a job for them afterwards also.**  
23 Q. What was that one?  
24 **A. I hate to say this, but I do not remember.**

23 (Pages 334 to 337)

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1 Q. Do you remember where you had to drive to get to  
2 it?  
3 **A. Oh, wait. One of them was FEMA, the storm. It**  
4 **was from November to December of -- I don't recall what**  
5 **year. I had to drive down to Continental Drive, right**  
6 **near Christiana Hospital.**  
7 Q. And that was a job through Bernard?  
8 **A. Yes. Because those pay stubs I would -- those**  
9 **paychecks I picked up over off of Kirkwood Highway, which**  
10 **is where she is located. Barney is located at 4th and**  
11 **Greenhill. Different office sites.**  
12 Q. Any other jobs you can remember after CitiSteel  
13 other than the one with Skelly?  
14 **A. Just temporary positions. I was accepting**  
15 **anything I could get actually.**  
16 Q. Were they all through Bernard?  
17 **A. No.**  
18 Q. What other temporary agencies did you use?  
19 **A. I don't -- I think one -- I cannot remember. I**  
20 **think one was called the Franklin Company.**  
21 Q. Franklin, is that right?  
22 **A. Yes.**  
23 Q. Where was that located?  
24 **A. Can't we look on the pay stubs for all this?**

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1 **Since I produced the pay stubs, can't we just look on the**  
2 **pay stubs? Wouldn't that make more sense?**  
3 Q. Well, I don't know if I have all of them here,  
4 but I can see what I do have. I would like you to  
5 recall.  
6 **A. Well, they are probably better than me sitting**  
7 **here recalling and trying to sit here and count back**  
8 **every moment of every day of every year.**  
9 Q. Well, instead of doing that what I would like you  
10 to do is give me any information that you have, not  
11 necessarily every moment of every year, but any places  
12 that you worked. Is that more reasonable?  
13 **A. Hercules, the Franklin Company.**  
14 Q. How long were you at Hercules? Was that a  
15 temporary?  
16 **A. It was like two weeks, I think.**  
17 Q. Was it through a temp agency?  
18 **A. I think I would rather say I don't recall or I**  
19 **don't remember instead of somebody trying to turn it**  
20 **around, you know. Because if you don't answer properly,**  
21 **what happens? You know, what does that get turned into?**  
22 **So if I don't have the proper and correct information for**  
23 **you and can't remember every little date, time and detail**  
24 **then, you know, I just can't recall. So that's the**

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1 **answer.**  
2 Q. I agree, if you do not have a recollection of the  
3 information, I do not want you to speculate.  
4 **A. But I told you, you are more than welcome to**  
5 **whatever you can get your hands on.**  
6 Q. So between the time you left CitiSteel on April  
7 10th, 2004, and the time that you started testing for the  
8 truck driving school in late 2005, at this point you have  
9 testified that you were employed at Bernard Personnel,  
10 Franklin Company and perhaps Hercules. At this time do  
11 you recall any other places that you have worked?  
12 **A. I flagged. Construction company.**  
13 Q. A construction company?  
14 **A. Yes.**  
15 Q. Do you recall the name of that?  
16 **A. Excuse me. May I, am I allowed to ask a**  
17 **question?**  
18 Q. No.  
19 **A. Well, don't you have copies of the pay stubs?**  
20 Q. Ma'am, I'm just asking you --  
21 **A. But you asked me this last week also. It is**  
22 **called the American Flag I think.**  
23 Q. Yes, that --  
24 **A. American Flaggers.**

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1 Q. And that's perfectly sufficient. That's quite  
2 enough. You are giving me enough information, so long as  
3 you explain that. Is the construction company the same  
4 thing as the American Flagging Company or were they  
5 separate employers?  
6 **A. The same.**  
7 Q. Any other employers?  
8 **A. Accounting clerk.**  
9 Q. Was that through a temporary agency?  
10 **A. Yes.**  
11 Q. Do you recall which one?  
12 **A. I can't remember the name.**  
13 Q. A different one than Bernard?  
14 **A. Yes.**  
15 Q. Any other employers?  
16 **A. I do not recall, ma'am.**  
17 Q. Have you ever sought medical treatment for your  
18 inability to recall?  
19 **A. No, not at all.**  
20 Q. Have you ever taken any medication for your  
21 inability to recall?  
22 **A. No.**  
23 Q. Are there any people who could help you recall  
24 this information?

24 (Pages 338 to 341)

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1 **A. No. Once I start looking at something, you know,**  
2 **it all comes back to you. Just like a diary, if you flip**  
3 **open a diary and you read a sentence out of it you can**  
4 **remember almost the whole entire day.**

5 **You know, I don't -- I just think**  
6 **everybody's ability is different in many ways such as**  
7 **remembering every single little thing.**

8 Q. Just to be clear, I'm asking about the 2003 to  
9 2005 period. Is that what your understanding has been  
10 thus far?

11 **A. No. Actually I think I have been asked questions**  
12 **that happened 20 -- when I was 16 and 17 years old also,**  
13 **so --**

14 Q. Relating to the job search?

15 **A. No, no. Just questions, digging 20 years ago,**  
16 **what does that have --**

17 Q. So for these purposes I am asking you about the  
18 limited period from 2003 to 2005. Do you understand that  
19 going forward?

20 **A. I will now.**

21 Q. Okay. And are you unable to recall for this  
22 limited period any additional employers?

23 **A. I gave you the pay stubs that I have. As far as**  
24 **remembering right now at this moment, tip of my tongue,**

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1 **no, I do not.**

2 Q. And that is my question. Have you ever sought  
3 medical treatment for the inability to recall the last  
4 three years of your employment?

5 **A. No.**

6 Q. Have you taken any medication for your inability  
7 to recall the last three years of your employment?

8 MS. BREWINGTON: Objection, asked and  
9 answered.

10 **A. I already answered that.**

11 Q. Actually, she didn't. She testified she believed  
12 that was for the period going back 20 years, so I just  
13 want to restate.

14 **A. We ought to hit rewind on that because I did**  
15 **answer that. I said no, no, I have never sought**  
16 **treatment. No, I have never taken medication for my**  
17 **ability to remember. It is on there.**

18 Q. Okay. And is there any people who would help you  
19 be able to recall the period from 2003 to 2005 of your  
20 employment?

21 **A. No.**

22 Q. Any documents that would help you recall the  
23 period of your employment from 2003 to 2005?

24 **A. Show me a pay stub that I do not have in my**

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1 **possession, sure, maybe that would help me recall.**

2 Q. Any documents that you know exist?

3 **A. No.**

4 Q. Okay. Let's jump over to the tapes. We have  
5 talked a lot about the tapes. Can you describe them for  
6 me? When were they recorded?

7 **A. A couple different dates. January and then**  
8 **April.**

9 Q. Of what year?

10 **A. 2003.**

11 Q. 2003?

12 **A. Yes.**

13 Q. How many tapes are there? That's not very clear.  
14 Not how many physical tapes but how many different  
15 conversations were recorded?

16 **A. Three? I'm asking you.**

17 Q. I don't know. If you don't recall, that's okay.

18 **A. I think it is three.**

19 Q. Okay. Who were the conversations between?

20 **A. One Randolph Harris. And then two, Jerry Downie.**

21 Q. Two with Jerry Downie?

22 **A. Yes.**

23 Q. One tape with Randolph Harris or one conversation

24 I mean?

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1 **A. Yes, I think, yes.**

2 Q. What are on those tapes that support your  
3 allegations?

4 **A. Which one?**

5 Q. Any of them?

6 **A. Which tape would you like to know?**

7 Q. Any of them.

8 **A. The one of Randolph harassing me?**

9 Q. Okay. That would be fine, if you think that  
10 there is one tape that describes, that demonstrates Mr.  
11 Harris, supports your claim that Mr. Harris harassed you.

12 **A. Asked me to come to work wearing a dress with no**  
13 **panties.**

14 Q. I want to go slow because this is very important.

15 **A. Okay.**

16 Q. There is a tape of Mr. Harris asking you? Go  
17 ahead.

18 **A. Him saying, "Shhh. Why are you saying that?"**

19 Q. He says S-H-H-H?

20 **A. Shhh.**

21 Q. Okay.

22 **A. Or "Why are you saying that?" He looks around.**  
23 **He admits to being scared.**

24 Q. Did Mr. Harris -- I'm sorry. I want to back up

25 (Pages 342 to 345)

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1 for one second. Did he say, did he say the words "dress  
2 with no panties"?  
3 **A. He said it to me three days prior.**  
4 Q. Okay. So on the tape it is being referenced but  
5 it is not --  
6 **A. I think that's the correct date. But he said**  
7 **that to me on the 7th of January. I brought it up.**  
8 **Whatever date is on the January tape, the first one, I**  
9 **brought it up.**  
10 Q. Okay. Did he respond when you brought it up on  
11 the tape?  
12 **A. He looked around. He says, "Why are you saying**  
13 **that?"**  
14 Q. Did he agree that he had said that?  
15 **A. He asked me why I was saying it. He didn't deny**  
16 **it.**  
17 Q. Okay. Did he know he was being taped?  
18 **A. No.**  
19 Q. What else on that tape is important to your  
20 claim?  
21 **A. Well, him trying to whisper. Well, see, it is a**  
22 **voice-activated recorder. So to you I'm louder, which**  
23 **I'm a naturally loud person anyway. It was right here,**  
24 **on my inside jacket pocket. But he was trying to be**

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1 quiet anyway. But he would come near me. He stood in my  
2 doorway and he kept looking up and down the hall. And he  
3 had this big long tube in his hand and you could here him  
4 tapping it. You can here him laughing at one point,  
5 saying he is going to turn his self in, picking up the  
6 phone.  
7 Q. He is going to turn his self in?  
8 **A. Yes.**  
9 Q. For what?  
10 **A. I guess sexually harassing me.**  
11 Q. Is that what it says on the tape?  
12 **A. Yes. He said he didn't -- well, I don't remember**  
13 **exactly word for word. But whatever was being said. And**  
14 **I said, "Well, what about all this time you have been**  
15 **sexually harassing me?" And he said, "I'm sorry, I**  
16 **didn't know you felt that way."**  
17 **I said, "What would you call it?"**  
18 **He even had a class in March. If you all**  
19 **want to call up Del Tech college and look up the class**  
20 **that he had in March, I know exactly -- the reason I know**  
21 **he had a sexual harassment class in March is because he**  
22 **came into my office, grabbed his gentile area and sat up**  
23 **on the table behind my desk, the very next day after the**  
24 **sexual harassment class that he had at Del Tech, and he**

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1 said to me, "You know, I thought about you last night."  
2 He said, "I had a sexual harassment class," he said, "and  
3 I'm sorry if that's the way I make you feel, or if that's  
4 what I have been doing to you."  
5 **And I said, "You are not sorry because you**  
6 **are going to do it again, just like you have been doing**  
7 **it."**  
8 Q. Is that on the tape?  
9 **A. About his class, no. I'm telling you that**  
10 **myself. So if we could put on our list to look up at Del**  
11 **Tech and get permission from Randolph Harris to have him**  
12 **sign a release to get his classes here, like we got to**  
13 **get everything about me, that would be good to add to our**  
14 **list.**  
15 **How would I know he had a sexual harassment**  
16 **class unless he come into my office telling me about the**  
17 **night before?**  
18 Q. I do want to get back to that, but let's return  
19 to the tapes.  
20 **A. Him not denying it, and him admitting to being**  
21 **scared and feeling guilty.**  
22 Q. What was he scared for? Did he say?  
23 **A. Of me.**  
24 Q. He was scared of you?

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1 **A. Yes.**  
2 Q. Why? Did he say why?  
3 **A. I don't recall. You can listen to it.**  
4 Q. What else? He was scared. What else?  
5 **A. Guilty.**  
6 Q. He says he was guilty?  
7 **A. However he says it, yes.**  
8 Q. Like a guilty conscience? I'm trying to  
9 understand the context.  
10 **A. Mm-hmm, yes.**  
11 Q. Did he say on the tape what he had a guilty  
12 conscience for?  
13 **A. I can't recall.**  
14 Q. Anything else on that tape that supports your  
15 claims?  
16 **A. Well, we can listen to it. I know we can record**  
17 **it on to that.**  
18 Q. I'm pretty sure we have been through this enough  
19 times you know what my response is going to be. I'm  
20 asking you for what you recall.  
21 **A. And I think you know what my response is going to**  
22 **be.**  
23 Q. What is your response?  
24 **A. I cannot remember every little single detail and**

26 (Pages 346 to 349)

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1 word. So if you give me a document, and then maybe that  
2 will trigger my little memory.  
3 MS. DIBIANCA: Counsel might want to  
4 instruct the witness that cooperation is key in this  
5 process.  
6 THE WITNESS: I'm cooperating the best of my  
7 ability.  
8 MS. BREWINGTON: Miss Snyder, just on the  
9 record, I want to instruct you to answer the questions  
10 that you are being asked to the best of your ability.  
11 THE WITNESS: I am. Okay.  
12 BY MS. DIBIANCA:  
13 Q. Is there anything else on the first tape that you  
14 can recall that would help support your claim of  
15 harassment?  
16 A. Just him laughing and not denying about the  
17 sexual -- about sexually harassing me, and us -- him  
18 whispering or asking me to whisper, shh, however he says  
19 it, laughing, picking up the phone.  
20 Q. So anything else on that one?  
21 A. No. I can't recall. No.  
22 Q. So I'm just going to restate them and you tell me  
23 if I'm incorrect in any way. This is the list that you  
24 gave us today for the first tape which reflects a

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1 conversation in January.  
2 A. Yes.  
3 Q. One, that he was whispering.  
4 I'm sorry, I don't know if I said this.  
5 This list is the list you have given us of things on that  
6 tape that will support the claims. I don't know if I  
7 said that before or not.  
8 Okay. Him whispering, Mr. Harris  
9 whispering. Mr. Harris laughing. Mr. Harris said he had  
10 a guilty conscience. Mr. Harris said he was scared of  
11 Miss Snyder. Mr. Harris did not deny it when Miss Snyder  
12 stated, the dress with no panties incident, we will say  
13 that and keep it broad. He did not deny that when she  
14 stated that. And Mr. Harris said he was going to turn  
15 himself in. Is that all correct?  
16 A. Yes.  
17 Q. Anything in there you want me to correct?  
18 A. No.  
19 Q. Okay.  
20 A. I don't think so.  
21 Q. Anything else to add to that list?  
22 A. I don't think so at the time.  
23 Q. If you think of something later certainly say at  
24 that time.

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1 A. Yes.  
2 Q. And then the second tape is what?  
3 A. Jerry Downie.  
4 Q. Do you know the time frame for that?  
5 A. April.  
6 Q. April 2003?  
7 A. Yes, ma'am.  
8 Q. What on that list or what on that tape, rather,  
9 supports your claims?  
10 A. Of Jerry Downie trying to make me move?  
11 Q. I don't know. Is that what the conversation is?  
12 A. Yes.  
13 Q. Is this the April 10th meeting?  
14 A. Giving me an ultimatum. Yes.  
15 Q. So this is the one we talked about before?  
16 A. Yes.  
17 Q. Prior, today?  
18 A. Yes.  
19 Q. Where he asked you to turn it off and you did for  
20 a moment and then turned it back on?  
21 A. Yes.  
22 Q. Okay. Unless there is something you want to add,  
23 I feel like we have covered that meeting enough.  
24 A. Mm-hmm, yes.

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1 Q. And then the third tape or third conversation,  
2 when did that take place?  
3 A. That was also Jerry Downie.  
4 Q. When was it?  
5 A. I think it was the same day.  
6 Q. Was that in the same meeting, on the 10th?  
7 A. Yes. I think so, yes.  
8 Q. So the only taped conversation that you have of  
9 Mr. Harris is one in January 2003; is that correct?  
10 A. Yes.  
11 Q. And the EEOC heard that tape?  
12 A. Yes.  
13 Q. What was Miss Wjasow's response?  
14 A. Whatever, she was just appalled at listening to  
15 them. That's what she said to me. She said, "This is  
16 appalling."  
17 Q. Okay.  
18 A. But then --  
19 Q. Did you have something else? I'm sorry.  
20 A. When, then it states -- never mind. It is  
21 totally irrelevant to your question.  
22 Q. Okay.  
23 A. I'm going to try to do what I'm supposed to do.  
24 Q. Do you remember what the EEOC's finding was in

27 (Pages 350 to 353)



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1 your charge of discrimination?  
2 **A. That Mr. Harris behaved unappropriately and**  
3 **unprofessionally, which I asked not only myself but**  
4 **everyone else in the world, what is the difference, tell**  
5 **me the difference when you sexually harass somebody, that**  
6 **is unprofessional and inappropriate. And then they gave**  
7 **me the right to sue letter.**

8 Q. So did they conclude that although he had behaved  
9 inappropriately and unprofessionally that there was no  
10 sexual harassment?

11 **A. I don't know who felt -- I guess. I don't know**  
12 **what they felt. I know what I felt.**

13 Q. Do you recall what the finding was?

14 **A. I remember those words. Show me something that**  
15 **helps trigger, trigger me. We have teamed up here. Show**  
16 **me something.**

17 Q. Do you recall what the official finding was by  
18 the EEOC?

19 MS. BREWINGTON: Objection, asked and  
20 answered.

21 MS. DIBIANCA: She hasn't answered.

22 MS. BREWINGTON: She said I don't recall.

23 But you can certainly ask her again.

24 THE WITNESS: They said unprofessionally and

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1 **you, and then retaliated against you for complaining by**  
2 **forcing you to transfer to another position. When you**  
3 **refused (because you believed that you should not have**  
4 **been the one to transfer), you were then discharged. In**  
5 **order for you to prevail, you must show that not only**  
6 **that the sexual harassment actually occurred, but that**  
7 **the transfer demand was made solely to punish you for**  
8 **making your complaint."**

9 **The next paragraph states, "The evidence**  
10 **shows that your allegation of sexual harassment cannot be**  
11 **confirmed. The taped conversations that you submitted to**  
12 **the EEOC clearly demonstrate unprofessional behavior, but**  
13 **do not meet the definition of sexual harassment as stated**  
14 **by law. The evidence also shows that although Respondent**  
15 **tried to conduct a thorough investigation into your**  
16 **complaints, you declined to completely participate by**  
17 **refusing to allow Respondent to hear the tapes, which you**  
18 **claimed" -- which claimed -- wait a minute -- "which you**  
19 **claimed proved your case. Finally, Respondent's transfer**  
20 **offer was made not in retaliation for your complaint, but**  
21 **as an attempt to keep you employed at Respondent and**  
22 **avoid any future problems. It was appropriate for the**  
23 **company to transfer you to another department where there**  
24 **was an available position."**

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1 inappropriate, and the right to sue letter. They gave me  
2 the right to sue. So there is that answer.

3 MS. DIBIANCA: Let me see if I can find it.  
4 That will help.

5 (Recess taken.)

6 MS. DIBIANCA: We are going to look at  
7 Snyder 4 from last time. See if Lori has a copy of that.

8 MS. BREWINGTON: I believe I do. If my 4 is  
9 the right 4.

10 MS. DIBIANCA: The EEOC package.

11 MS. BREWINGTON: Yes, I have that.

12 BY MS. DIBIANCA:

13 Q. On page 29. This is Snyder 4, marked as  
14 Exhibit page 29, and had already previously been marked  
15 as D262. Do you recall that document?

16 **A. Yes.**

17 Q. Can you tell me what it is?

18 **A. A letter from EEOC.**

19 Q. This was written by Miss Wjasow?

20 **A. Yes.**

21 Q. What does it say, if you can summarize it? If  
22 not, you can read it.

23 **A. "I have completed my review of your charge of**  
24 **discrimination alleging that Respondent sexually harassed**

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1 **No there was not a position open there.**

2 **"For these reasons it is recommended that**  
3 **this matter be dismissed and a Dismissal/Notice of Rights**  
4 **be issued to you. We appreciate the opportunity to serve**  
5 **you to the extent based on the available evidence."**

6 **They did give me a right to sue and there is**  
7 **not a position open there. That is false.**

8 Q. So for the record purposes, real quick, when you  
9 stated there was not a position available, that was your  
10 commentary? That was not in letter, correct?

11 **A. I don't care what is in this letter.**

12 Q. Right. I'm just asking so when the transcript  
13 reads we can understand that you were saying, not reading  
14 the words on the transcript or on the letter.

15 **A. I was saying that myself.**

16 Q. Right.

17 **A. There was not a position open. That's correct.**

18 Q. Let's talk about that. What do you disagree with  
19 in this letter?

20 **A. Everything.**

21 Q. Is that because Miss Wjasow was being untruthful?

22 **A. She didn't come down and conduct an**  
23 **investigation.**

24 Q. So her letter was untruthful?

28 (Pages 354 to 357)

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1 **A. If that's how you want to put it, you put it that**  
2 **way.**  
3 Q. I don't want to put it any way. I just want you  
4 to tell me what you think.  
5 **A. I know it was untruthful.**  
6 Q. Okay.  
7 **A. He was sexually harassing me, period. I don't**  
8 **care if I got a video of him doing it or not. I know he**  
9 **did it. He knows he did it. He doesn't deny it.**  
10 **And the Department of Labor also stated that**  
11 **Mr. Downie -- they did not make me voluntarily resign.**  
12 **There is no such thing.**  
13 Q. And that is --  
14 **A. And that is what they did.**  
15 Q. And the Department of Labor, that was the  
16 unemployment insurance group?  
17 **A. Yes.**  
18 Q. Okay. So do you want to point to specific things  
19 in here that you disagree with?  
20 **A. The whole page.**  
21 Q. Okay. Then you did receive a right to sue, which  
22 is actually on page 12 of the same exhibit.  
23 I'm sorry. No, it is not. It is in a  
24 different exhibit. I don't need to say anything about it

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1 so I'm not going to talk about it. It was in Snyder 1,  
2 for the record, if that makes it easier for reading  
3 purposes.  
4 The last time we talked about pharmacies you  
5 said you produced some records from Happy Harry's. They  
6 were from Philadelphia Pike.  
7 **A. Yes.**  
8 Q. Is there any other Happy Harry's that you went  
9 to?  
10 **A. No. No.**  
11 Q. Is there any other pharmacies that you used?  
12 **A. No.**  
13 Q. Let's jump to damages. How about that. I'm  
14 jumping around. I apologize.  
15 Do you understand that you are claiming  
16 damages for emotional distress?  
17 **A. Yes.**  
18 Q. Can you tell me what the injuries are that you  
19 have suffered for those damages?  
20 **A. Besides crying all the time and feeling invaded.**  
21 **What else is there?**  
22 Q. I don't know. Crying is one?  
23 **A. Crying. Shocked, disbelief. Made me a mess,**  
24 **that's what he did.**

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1 Q. And when did you first start to have those  
2 symptoms?  
3 **A. I sat in the parking lot and cried a couple of**  
4 **times and called my dad.**  
5 Q. When?  
6 **A. 2002.**  
7 Q. What part of the year?  
8 **A. I think it is -- I don't know. November,**  
9 **October. Somewhere around that.**  
10 Q. Crying, shock, disbelief, those all occurred in  
11 November, October 2002?  
12 **A. 2002, yes. And continued on.**  
13 Q. Okay. When did they stop?  
14 **A. The day they opened the door and escorted me off**  
15 **the grounds.**  
16 Q. April 10th, 2003 those symptoms stopped; is that  
17 correct?  
18 **A. Yes.**  
19 Q. What other injuries or how else have your damages  
20 manifested themselves?  
21 **A. Just made me a little basket case. My boss**  
22 **fondling and sniffing me every day, I think that gets to**  
23 **a person.**  
24 Q. I mean, I don't want to guess for you. I just

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1 want to make sure you get an opportunity to express all  
2 the systems that you had.  
3 **A. Angry.**  
4 Q. When did you experience anger?  
5 **A. When he started putting his hands on me, sniffing**  
6 **me, stroking my hair. I usually, because I had to wear a**  
7 **hard hat, I usually turn my hair into one solid braid.**  
8 Q. Do you know a time frame for that?  
9 **A. No. Various. Various.**  
10 Q. When did it end?  
11 **A. The day they opened the door and escorted me off**  
12 **the grounds.**  
13 Q. What else during that time?  
14 **A. Just a little basket case.**  
15 Q. Did you have any symptoms after April 10th, 2003?  
16 **A. Yes, just crying all the time and complaining and**  
17 **in a state of shock, couldn't believe they did that.**  
18 Q. That was after April 10th, 2003?  
19 **A. Yeah. Oh, my God, I couldn't drive. The day**  
20 **they did that, I sat on the side of the road for like two**  
21 **hours. I was hysterical. I was crying. I called my dad**  
22 **from the side of the road. I called Carmella too.**  
23 Q. How long did that last?  
24 **A. I don't know. I sat there for awhile. I**

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1 couldn't drive. I couldn't see.  
2 Q. Did you seek any treatment?  
3 A. Yes. I ended up going to my doctor. I ended up  
4 calling him because I wouldn't stop crying. He gave me  
5 that stuff to help stop me from crying all the time.  
6 Q. Which doctor?  
7 A. Goodman.  
8 Q. Dr. Goodman. When did you call him?  
9 A. I don't know. Soon after. I don't know how  
10 soon. It could have been a couple weeks.  
11 Q. Okay. Do you want to say less than a month? Or  
12 is that fair? Maybe not?  
13 A. Maybe around there. Because all I did was sit in  
14 the house and cry. I had called Vicky, you know. My  
15 boyfriend and my dad was saying, you know, get over it,  
16 you know, you got to get a job, you know, you can't just  
17 lock yourself away, you know, and just, you know, wanted  
18 me to go seek professional help such as a lawyer for  
19 them, you know, just tossing me to the side like that.  
20 Q. Who is that? Oh --  
21 A. Mr. Harris and Mr. Downie.  
22 Q. I thought you were referencing an attorney. I'm  
23 sorry.  
24 A. I guess they got scared of me crying all the

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1 time, you know what I mean.  
2 Q. When did you stop crying all the time?  
3 A. I guess once I started taking that Lexapro stuff.  
4 Made me stop crying. I was able to handle things better.  
5 I mean to this day I still can't believe  
6 they did it.  
7 Q. Shock?  
8 A. Any of them, yes.  
9 Q. Yes.  
10 A. But, you know, it is true. Life does go on.  
11 Q. Anybody else besides Dr. Goodman? Did you see  
12 any other healthcare professionals for the crying all the  
13 time?  
14 A. Miss Wright.  
15 Q. Miss Wright, Cynthia Wright?  
16 A. Yes, ma'am.  
17 Q. When did you see her?  
18 A. I'm going to produce those receipts to you.  
19 Q. Oh, okay. Were you already seeing her when you  
20 worked at CitiSteel?  
21 A. No.  
22 Q. No, okay. So you started seeing her for the  
23 first time after April 10, 2003?  
24 A. Yes.

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1 Q. Do you remember if it was before or after when  
2 Dr. Goodman prescribed the Lexapro?  
3 A. I don't remember if it was before or after.  
4 Q. Okay. Which practice group was she with at the  
5 time? I know she has since changed.  
6 A. She was with Concord Wellness. But now she is on  
7 Limestone Road, and I do not recall the name of it, but I  
8 think Concord Wellness -- I did talk to her one time  
9 while he was she was on Limestone Road. That's how I  
10 found out she moved. And I think all you have to do, if  
11 you call Concord Wellness Center, they will tell you  
12 exactly how to locate Mrs. Wright.  
13 Q. So you did not see her at her new practice on  
14 Limestone Road?  
15 A. No.  
16 Q. What did you seek treatment from Miss Wright for?  
17 A. Somebody to talk to. Mr. Goodman -- Dr. Goodman,  
18 I'm sorry, you know, thought it would be a good idea,  
19 talk to somebody.  
20 Q. He recommended you seek therapy of some kind?  
21 A. Yes.  
22 Q. So it would have been -- I won't speculate.  
23 Okay. And how did it go with Miss Wright? Did she give  
24 you counseling?

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1 A. Yes.  
2 Q. How often did you see her?  
3 A. Usually once a week.  
4 Q. Do you remember for how long?  
5 A. Until I couldn't afford the Cobra anymore, I  
6 think.  
7 Q. Specifically, what was she treating you for?  
8 What were your complaints or problems that you were  
9 discussing with her?  
10 A. CitiSteel, Randolph Harris, Jerry Downie. Well,  
11 CitiSteel. They are CitiSteel.  
12 Q. Obviously, CitiSteel wasn't in the counseling  
13 session, so what was she discussing with you? What  
14 emotions were you discussing with her? What problems  
15 were you trying to solve? That might be a better way to  
16 put it.  
17 A. She was just trying to help me cope with things,  
18 somebody to talk to.  
19 Q. Were you having difficulty coping?  
20 A. Yes, at first. I mean, you know, I grabbed back  
21 on. Got out of the house.  
22 Q. When did you start to improve?  
23 A. A couple months later I guess, started. But I  
24 mean, like I said, to this day, now, I mean I was -- then

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1 it was more being upset. You know, and just the way they  
2 treated a human, you know.  
3 I've seen things on TV where -- you know,  
4 but they are TV shows. Just in a state of disbelief.  
5 You know, I couldn't believe it happened.  
6 But now, as time comes about, it is more  
7 anger. So I got upset for a long time, sure. I still  
8 get upset about it. Little things here and there trigger  
9 something. It pisses me off.  
10 Q. Did Cynthia Wright help you with the anger  
11 issues?  
12 A. Yes. Well, she -- you know, she was somebody to  
13 talk to. She helped me calm down. Just crying all the  
14 time. I was paranoid a lot.  
15 Q. How so?  
16 A. I don't know. I thought that if they did all  
17 that to me, Lord knows what else they were capable of. I  
18 thought they might want to come and get me. I was  
19 paranoid.  
20 Q. CitiSteel?  
21 A. Yes. Especially once I, you know, started  
22 seeking legal counsel, I thought that might really make  
23 them mad, that I was fighting back. So...  
24 Q. When did you first seek legal counsel? With Mr.

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1 LaRosa?  
2 A. Yes. You should have it dated somewhere. I  
3 don't recall.  
4 Q. I thought it was right after the EEOC, you filed  
5 your EEOC charge.  
6 A. Somewhere.  
7 Q. Well, we don't have any --  
8 A. I didn't meet with LaRosa before EEOC. So I  
9 don't know them then.  
10 Q. I don't have any documents to help you refresh  
11 your memory on this one.  
12 A. For who?  
13 Q. For when you first engaged Mr. Neuberger's  
14 office. Do you recall when that was? You said it was  
15 after --  
16 A. It was after.  
17 Q. -- the EEOC?  
18 A. Yes. I'm going to just take a guess, say maybe  
19 around May.  
20 Q. So once you sought legal counsel then you became  
21 more paranoid?  
22 A. Yes.  
23 Q. Had you ever experienced paranoia before?  
24 A. No, no.

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1 Q. Did you take any medicine that could make you  
2 paranoid as a side effect?  
3 A. No.  
4 MS. BREWINGTON: Off the record.  
5 (Discussion off the record.)  
6 BY MS. DIBIANCA:  
7 Q. Had you ever sought healthcare treatment or any  
8 kind of related treatment for paranoia prior to Miss  
9 Wright?  
10 A. No.  
11 Q. Did you work with Miss Wright for paranoia?  
12 A. I told her I was paranoid. I mean what do you  
13 mean by work with her?  
14 Q. That's what I mean.  
15 A. Yes.  
16 Q. Did she give you any exercises or anything to  
17 help you cope with the paranoia?  
18 A. I think there was pamphlets to read.  
19 Q. Did you feel that that improved?  
20 A. As time went on, I, you know, I wasn't paranoid  
21 like that. In the very beginning I was very, very  
22 paranoid. But as time went on, no.  
23 Q. Do you recall when you first started noticing the  
24 symptoms of paranoia?

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1 A. Yes, when I locked myself in my boyfriend's house  
2 and I kept double checking the windows and the doors, and  
3 then I would want to talk to him. I couldn't sleep.  
4 Q. When was that?  
5 A. A lot during the first several weeks.  
6 Q. Immediately --  
7 A. After they, yes, yes.  
8 Q. Sorry. Immediately after CitiSteel?  
9 A. Yes.  
10 Q. What about at the end of your employment at  
11 CitiSteel, did you feel concerned about paranoia at that  
12 time?  
13 A. No. I had nothing to be paranoid about.  
14 Q. For example, when you walked in and you saw the  
15 pile of papers in the meeting of the 10th, were you  
16 paranoid at that time?  
17 A. No, I had nothing to be paranoid about.  
18 Q. Did you believe they were going to terminate you?  
19 A. Yes, because I knew I wasn't giving them their  
20 way. In the back of my mind, I mean, I believe never say  
21 never, but I knew I wasn't giving up, because I did  
22 nothing wrong. But I knew what they were trying to do.  
23 They were trying to push me into a corner.  
24 Let me tell you, really, I don't know, you

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1 are the lawyer here, and I may not know what you know,  
2 but I do know that Delaware is an at-will state and they  
3 can fire you for wearing the wrong color hair piece.  
4 But when you turn in your supervisor for  
5 sniffing you and for grabbing you and talking all that  
6 nasty trash that he does and was doing, no, they are not  
7 supposed to give you an ultimatum and/or let you go.  
8 They were not letting me go back to my  
9 office. And I knew that. And I knew I wasn't going  
10 anywhere besides back to my office. Because when I'm  
11 right, I'll fight to the end. I did nothing wrong. I  
12 said nothing wrong. He did and they did.  
13 So when I seen that pack of papers, I don't  
14 really know what was in that pack of papers, but in the  
15 back of my mind I believe never say never, and anything  
16 is possible, and I'll be darned if it wasn't true. Look  
17 what happened. Look where I sit today.  
18 After all this trash they throw at me, they  
19 want to open a door and toss me out the door like I'm  
20 nothing. They want to sit there and print up all them  
21 handbooks for employees to have. Well, they need to  
22 reread them handbooks. They need to retake some classes.  
23 Q. What else, what other symptoms did you have or do  
24 you have still, if you do still have some?

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1 A. Anger.  
2 Q. The anger is the one you still have?  
3 A. Oh, yes.  
4 Q. Do you take anything for the anger?  
5 A. No, not anger to where I -- you know, it just,  
6 sitting out, sitting here, answering a million questions,  
7 you know, I'm sitting here thinking to myself, my God,  
8 why am I going through this. I didn't do nothing to  
9 nobody. You know, just anger to where -- I think you  
10 know the kind of anger. I think everybody here knows the  
11 kind of anger. But, you know, angry to where I'm not  
12 letting them get away with it. They are not treating me  
13 like that.  
14 Q. Did the anger ever cause you any kind of problems  
15 in your day-to-day life?  
16 A. The anger, no. The being upset and the paranoia,  
17 it did. But mostly in the beginning.  
18 Q. What else caused you trouble in your daily life,  
19 if anything?  
20 A. It was all CitiSteel. Nothing --  
21 Q. I'm sorry, I wasn't clear. I just mean similar  
22 to being upset, and you said the anger didn't cause you  
23 problems in your daily life but --  
24 A. Just crying all the time, just sitting around.

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1 Q. Can you tell me anything that impaired you from  
2 doing, prevented you from doing or being upset?  
3 MS. BREWINGTON: I'm going to say objection  
4 to that to form.  
5 MS. DIBIANCA: Do you want me to rephrase  
6 it?  
7 MS. BREWINGTON: Yes.  
8 BY MS. DIBIANCA:  
9 Q. Sure. Was there anything after you left  
10 CitiSteel, was there anything that you couldn't do any  
11 longer that you had done before because of being upset?  
12 A. Well, I couldn't really leave the house. You  
13 know, I had to force myself, you know, when I first  
14 started, you know, seeking employment. I mean, and then  
15 it just, it took a lot out of me to get a shower and get  
16 dressed and get out of the house. Once I did, I went  
17 right back to the house.  
18 Q. So how long was it before you could leave the  
19 house?  
20 A. Well, I went to see Vicky. That was soon after.  
21 And then once I was done with Vicky, I went right back  
22 home.  
23 Q. Vicky is Bernard Personnel?  
24 A. Yes, ma'am.

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1 Q. How long did you collect unemployment for?  
2 A. I don't know. I even asked -- I ended up asking  
3 for an extension because I couldn't find employment. I  
4 had the unemployment stubs.  
5 Q. Actually they have been produced. I do recall  
6 them.  
7 A. Okay.  
8 Q. How long after you left CitiSteel did  
9 unemployment start, did you get your first unemployment  
10 check?  
11 A. I got one or two, and then they stopped.  
12 Stopped. We went to arbitration. I don't know what you  
13 call it.  
14 Q. The appeal?  
15 A. The appeal.  
16 Q. Okay.  
17 A. And then after that was over, the referee -- I  
18 said that right -- finally sent me a letter stating he  
19 found all facts in my favor, and then they sent me some  
20 checks and so forth.  
21 Q. Now, the Snyder 13, that was one small piece of  
22 that appeal hearing. The date on that appears to be May  
23 12th, 2003?  
24 A. Yes.

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1 Q. Now, at that time were you able to go out of the  
2 house?  
3 **A. Well, I did. I had to.**  
4 Q. Regularly?  
5 **A. Well, no. When I had to see LaRosa and the**  
6 **Department of Labor.**  
7 Q. So were you able to leave your house for any  
8 reason other than --  
9 **A. I would go to un -- I'm sorry.**  
10 Q. That's okay. Other than to see your attorney or  
11 the Department of Labor?  
12 **A. I would go to the Department of Labor to use**  
13 **their fax machine, because you are allowed to get a job**  
14 **through them.**  
15 Q. Okay.  
16 **A. That's it.**  
17 Q. Actually, let's just go quickly, or not quickly,  
18 whatever you prefer, through the various allegations that  
19 Mr. Harris did to you, said to you, etcetera, that form  
20 the basis for your harassment claim. Let's talk about  
21 those. Actually, I don't think we have really touched on  
22 them yet.  
23 Do you remember what the first incident was?  
24 **A. Well, I didn't look at it as an incident. I**

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1 **don't know how you want to label it. But my second day**  
2 **there he said he was going to take me out for a beer. He**  
3 **didn't say "Will you?" He said, "I'm going to take you**  
4 **out for a beer sometime."**  
5 **I didn't think nothing of it, not like that,**  
6 **at that time. But when I went home, I did tell my mother**  
7 **and my aunt, I said, "Well, my boss said he was going**  
8 **take me out for a beer," because I just thought that was**  
9 **-- I thought it was odd, but I didn't think bad bad, you**  
10 **know what I mean.**  
11 Q. Did you think it was friendly?  
12 **A. Now I don't. Then, I thought to myself, which I**  
13 **said to my aunt and my mother, you know, "My boss said he**  
14 **is going to take me out for a beer sometime," why would a**  
15 **boss say that to somebody their second day of work? I**  
16 **mean, really.**  
17 Q. So you were confused, do you think, on the second  
18 day as to what the motivation was?  
19 **A. Yes, motivation, yes.**  
20 Q. And then later you decided that, you concluded  
21 that that was harassment?  
22 **A. I guess part of it or maybe his intent. I don't**  
23 **know. I really don't know. I didn't even ask Mr.**  
24 **Harris.**

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1 Q. Do you recall that that supports your claim of  
2 harassment, that incident?  
3 **A. No.**  
4 Q. What do you think supports your claim of  
5 harassment?  
6 **A. Him squeezing my checks.**  
7 Q. Let's talk about that. He squeezed, stroked?  
8 What would be the correct word?  
9 **A. Do you want to take my picture again?**  
10 Q. Pinched?  
11 **A. Squeeze.**  
12 Q. Squeezed?  
13 **A. Squeezed.**  
14 Q. Okay. When did that happen?  
15 **A. A couple times.**  
16 Q. More than once?  
17 **A. Yes.**  
18 Q. Do you know when the first time was?  
19 **A. No.**  
20 Q. Can you give me any description of the time  
21 frame?  
22 **A. Maybe end of 2002, beginning of 2003. Maybe**  
23 **somewhere around there. I know I do not recall.**  
24 Q. It is just important that we form a chronology of

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1 the allegations of Mr. Harris' alleged actions so that we  
2 can get them in order. So I want to make sure we get the  
3 first one first, the second one next, etcetera. So if  
4 you remember something else and you want to fill it in,  
5 that's totally fine. You can do that at any time.  
6 **A. He didn't squeeze my checks first, is that what**  
7 **you are saying to me?**  
8 Q. Yes, that is.  
9 **A. No.**  
10 Q. I want to know what came first. Obviously, the  
11 beer, asking you out for a beer?  
12 **A. Then telling me he is going to take me away, when**  
13 **am I going to let him take me away for the weekend.**  
14 Q. When did that happen?  
15 **A. Well, within my first year there he said**  
16 **something, but to the exact date, no, I don't know.**  
17 **But then it got to be every time I would go**  
18 **away, when I would come back on Monday, so I just quit**  
19 **telling him -- I just started saying nothing when he**  
20 **would ask what I did over the weekend. He always asked**  
21 **on Monday what I did over the weekend.**  
22 Q. And you think that supports your claim of  
23 harassment?  
24 **A. Him, when am I going -- him asking me when he is**

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1 going to let me -- when am I going to let him take me  
2 away. Yes.  
3 Q. Did he say this to you on more than one occasion?  
4 A. Yes.  
5 Q. What was your response?  
6 A. I never really responded at all. I just walked  
7 away.  
8 Q. That's a response, walking away.  
9 A. But I also would say "never," and I don't know  
10 how many times I would have to tell him no, I'm not going  
11 out with him.  
12 Q. In response to him asking you to go away for the  
13 weekend?  
14 A. Just when are we going out. Every other day the  
15 man was saying or doing something to me. You can put in  
16 whatever word you want. The squeezing of my cheeks came  
17 later.  
18 Q. What came after him asking you when are you going  
19 out? What was the next incident?  
20 A. When am I going out, what?  
21 Q. Asking you to go out or going away for the  
22 weekend, something along those lines?  
23 A. Just always telling me how good I looked, and  
24 just staring at me with his nasty stares, and then when

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1 he started squeezing me and sniffing me and stroking my  
2 hair.  
3 Q. What about the --  
4 A. When he stood in my doorway and I had to push him  
5 out of the way, is that the one you were going to ask me?  
6 Q. Whatever one is next.  
7 A. I really don't know what order they came in.  
8 When I pushed, that was definitely after 2003 because I  
9 was getting really pissed off.  
10 Q. Okay. The doorway incident?  
11 A. Yes.  
12 Q. Tell me about that.  
13 A. He wouldn't get out of my way, so I pushed my way  
14 through.  
15 Q. Did you ask him to move?  
16 A. Yes.  
17 Q. How did you ask him?  
18 A. I asked him to please get out of my way.  
19 Q. Did he say anything?  
20 A. I don't recall. He always just stared at me with  
21 his nasty little smirk.  
22 Sometimes when he would say something, he  
23 would hurry up and he did this dash thing, he would run  
24 away from me.

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1 Q. Dash?  
2 A. A dash, like a ballerina, like a dash. He would  
3 dash out of the office.  
4 Q. Was it done to be funny?  
5 A. I, I think he did it to run, knowing I wanted to  
6 knock his block off actually. I don't know why he did  
7 it. He always did it. He knew he was being a smart -- I  
8 am allowed to cuss now?  
9 Q. Mm-hmm.  
10 A. Smart ass. He knew he was being a smart ass.  
11 Q. Did he do it before your relationship went south?  
12 Did he do it in a friendly context ever?  
13 A. No.  
14 Q. No.  
15 A. Not until after he started being the little  
16 pervert he is.  
17 Q. Okay. Literally, when you say dashed, explain it  
18 again to me. I'm sorry. I understand the ballerina  
19 part.  
20 A. It was like he was kind of running from me with a  
21 dash (Indicating.)  
22 I told you you could take my picture while  
23 I'm trying to describe to you if you wanted. I don't  
24 know how else to tell you.

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1 Q. That's good enough. Okay. What else? Doorway  
2 incident. That was after 2003. What else? The cheeks,  
3 pinching your cheek or squeezing your cheek?  
4 A. Squeezing my check.  
5 Q. When did that happen?  
6 A. A couple times.  
7 Q. Do you know around what times?  
8 A. No.  
9 Q. What happened during that incident?  
10 A. Nothing. I probably smacked at him there too. I  
11 always just told him to get off and get away from me.  
12 Q. Okay. Did he?  
13 A. Yes, but then he would always end up coming back.  
14 Q. What else? Squeezing of the cheek? There was  
15 hair I think, stroking hair?  
16 A. Stroking, smelling me.  
17 Q. Is that all the same incident?  
18 A. No.  
19 Q. Tell me about the hair?  
20 A. It was an all-the-time thing.  
21 Q. Stroking your hair?  
22 A. He didn't just do all this in one day.  
23 Q. Okay. Go ahead and explain.  
24 A. That's it. Sniffing, touching me, talking nasty,

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1 staring at me nasty, asking me to come to work wearing a  
2 dress with no panties. What do you call this? I don't  
3 know what you call it. I call it sexual harassment.  
4 Asking me out, when am I going to let him  
5 take me out. What do you people call it? Right in your  
6 minds, all of you answer yourselves, what do you call it?  
7 Q. Stroking the hair?  
8 A. What about it?  
9 Q. How many times did he do that?  
10 A. I don't know. Several. Many.  
11 Q. More than five?  
12 A. 20 million.  
13 Q. Are you taking this seriously?  
14 A. Yes. I don't know. I never -- I didn't count.  
15 You know, I didn't sit there and count. I didn't all of  
16 a sudden stop my job and write down, okay, he did stroke  
17 my hair at this moment.  
18 I was busy. I had two bosses and I did all  
19 that work for the melters. So I don't know the exact  
20 date when he stroked my hair. I don't know the exact  
21 date on which occasion, how many times I punched at him.  
22 All I know is he was a major interruption to my job.  
23 Q. Any other incidences that you believe support  
24 your allegations?

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1 We have asking you out for a beer on your  
2 second day of work, asking to take you out regularly, the  
3 doorway incident where he would not move out of your way,  
4 squeezing of the cheek, stroking your hair --  
5 A. Taking me away for the weekends. Sniffing me.  
6 Asked me to come to work wearing a dress with no panties.  
7 Always telling me how good I look.  
8 Q. Let's talk about the dress incident. Can you  
9 tell me about that? When did that occur?  
10 A. January 7th. I do remember that.  
11 Q. Why is it that you remembered that date?  
12 A. Because he asked me -- I never turn down work.  
13 And he asked me -- that was the date of the floor tiles.  
14 Well, he asked me if I would come into work that  
15 Saturday, and I think that Saturday was going to be the  
16 10th. I'm not sure. I can look at the calendar.  
17 And I said yes, and then I think he asked me  
18 that in the hallway. There was other people around.  
19 Now, when he came in to the office, he said, "By the way,  
20 when you come to work on Saturday, wear a dress with no  
21 panties," and he did his little chuckle thing and hurry  
22 up and ran out and ran down there with the other people,  
23 down the little hall, it is a little hallway.  
24 Well, now, the floor tiles -- he had vendors

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1 standing in the hallway, lined up, and he had to meet  
2 with them. So he would shut his door and have a meeting  
3 with one and others were standing out there. Well, I  
4 tripped on one.  
5 Q. On one what?  
6 A. On a floor tile. So I caught myself. So I  
7 decided to send the safety manager, coordinator, whatever  
8 he called his self, Jim Moran at that time, that's what  
9 his title was, I sent him a copy -- excuse me. I sent  
10 him an e-mail about the floor tiles and I cc'd it over to  
11 Dennis Ford and Randolph Harris.  
12 Well, even the vendors were in the hallway  
13 saying something about the floor tiles. But, now, before  
14 this floor tile thing was that he asked me if I wanted to  
15 work on Saturday.  
16 Q. Where was he in relationship to you when he said  
17 the comment?  
18 A. Come to work wearing a dress with no panties?  
19 Q. Yes.  
20 A. When you walked in my office, there was this  
21 shelf thing with printers on it, various printers.  
22 Q. Okay.  
23 A. It read numbers all through the night. Okay.  
24 They are the numbers that helped me figure out my report

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1 in the morning.  
2 And to the right was a shelf up here with  
3 all the binders, and a table. Here is my desk to the  
4 left.  
5 I was actually at the table behind, not  
6 behind the door but a little bit down over. He was  
7 inside -- he was here. I was here. Here is the door.  
8 So he was not -- he was inside the office, but he was  
9 closer to the door. He was in between myself and the  
10 door.  
11 Q. So how many feet would that have been away from  
12 you, an estimate?  
13 A. Four or five.  
14 Q. Four or five feet, okay.  
15 A. Maybe not even.  
16 Q. Okay. Is that a problematic question for you?  
17 A. No.  
18 Q. Okay. What did you respond?  
19 A. I went to tell him to shut up, but he done ran  
20 out of the office. He did his little ballerina dance,  
21 and chuckled and laughed and ran out.  
22 Q. So you did not say anything to him in response?  
23 A. I started to, but he ran out.  
24 Q. And then the next time you saw him after that,

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1 how long was it until you saw him next?  
2 **A. When he was freaking out because I sent an**  
3 **e-mail.**  
4 Q. So you sent the e-mail about the tiles after he  
5 made this comment about the dress with no panties?  
6 **A. Yes.**  
7 Q. And you sent the e-mail to Mr. Ryan?  
8 **A. Yes.**  
9 Q. And that was actually admitted last time, Snyder  
10 5, just for record keeping purposes.  
11 Why didn't you mention the comment to Mr.  
12 Ryan at that time in the e-mail?  
13 **A. Mention what comment?**  
14 Q. Well, the dress with no panties comments by Mr.  
15 Harris.  
16 **A. Why would I tell Mr. Ryan?**  
17 Q. Why wouldn't you?  
18 **A. Because I didn't. Why would I tell Mr. Ryan, a**  
19 **safety coordinator, why would I send out an e-mail**  
20 **stating what Randolph Harris just said to me?**  
21 Q. I don't know. I'm asking you.  
22 **A. Because I didn't. Why would I?**  
23 Q. Did you think it was important?  
24 **A. What Randolph said to me?**

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1 Q. Yes.  
2 **A. I think it was nasty and disgusting.**  
3 Q. Yes.  
4 **A. I don't think it had anything to do with the**  
5 **floor tiles. The floor tiles got sent, you know, always**  
6 **after that comment. That was done in his office, with**  
7 **visitors, with vendors he buys supplies.**  
8 Q. How long after?  
9 **A. I don't know.**  
10 Q. Let me look.  
11 **A. I don't know. Because he had a line of vendors**  
12 **in the hallway, and when they kept playing with him, and**  
13 **one of them said -- now, I done tripped on it, but I**  
14 **caught myself. And one of them said, "Something ought to**  
15 **be done about the floor tiles," that's when I decided to**  
16 **take it upon myself and contact Mr. Ryan. I sent him an**  
17 **e-mail, and I wanted Ford and Harris to see that I was**  
18 **trying to get the floor tiles fixed. I thought I was**  
19 **doing a good thing. And Mr. Harris got paranoid and**  
20 **thought I sent a floor tile to Jim Ryan because of the**  
21 **comment he made to me.**  
22 Q. Okay. So the dress and panties comment, was that  
23 in the morning? In the afternoon? What time of day was  
24 that?

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1 **A. I really don't recall. I think it was either**  
2 **late in the morning or early, early afternoon. I'm**  
3 **pretty sure.**  
4 Q. When was the tile e-mail?  
5 **A. It was after.**  
6 Q. After the panties comment?  
7 **A. Yes, because then he didn't want me -- he said,**  
8 **"Never mind, you don't have to come to work on Saturday,"**  
9 **I'm assuming because he got mad at me for sending in an**  
10 **e-mail to Mr. Ryan.**  
11 Q. Mr. Harris?  
12 **A. Yes. So now he wouldn't let me work on Saturday,**  
13 **because I sent a floor tile, e-mail about tiles, which**  
14 **made no sense to me at all.**  
15 Q. So you think he was mad about the incident?  
16 **A. He was paranoid. Mad and paranoid, yes.**  
17 Q. And that you had sent the e-mail about the tiles?  
18 **A. Yes. And that's also what we discussed on that**  
19 **tape made of Randolph Harris.**  
20 Q. Okay. Why do you think he said the comment about  
21 wearing a dress with no panties?  
22 **A. Probably because he is a pig.**  
23 Q. Any other reason?  
24 **A. He is just a nasty, ignorant person. And I think**

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1 **he takes his position, you know, his authority, I think**  
2 **it has gone to his head.**  
3 Q. I mean, did you believe at that time that he  
4 expected you to do that? Or did he say it for some other  
5 reason?  
6 **A. I don't think he could be that stupid to think**  
7 **I'm really going to walk in there with a dress wearing no**  
8 **panties, but deep down, yes, he did mean it. Yeah, he**  
9 **meant it.**  
10 **Haven't you met the man yet? Oh, that's**  
11 **right. He is probably pretending to be somebody else.**  
12 MS. BREWINGTON: Okay. I want to go on the  
13 record one more time. I need you to only answer the  
14 question that are being asked, please.  
15 THE WITNESS: Okay.  
16 MS. BREWINGTON: So we can get this to move  
17 along. Okay.  
18 BY MS. DIBIANCA:  
19 Q. Let's look at Snyder 5. It is a single page  
20 e-mail. I'll have to get it back.  
21 Let me ask you this. Snyder 5, which has  
22 been previously marked as P285, is this the e-mail that  
23 you sent to Mr. Ryan regarding the tiles?  
24 **A. Yes.**

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1 Q. Do you notice that below the e-mail there are  
2 handwritten notes?  
3 **A. Yes.**  
4 Q. And are those your handwritten notes?  
5 **A. Yes.**  
6 Q. Let me ask you this: When were these notes  
7 written?  
8 **A. I don't know.**  
9 Q. Do you know if you would have written them the  
10 day you wrote the e-mail?  
11 **A. The day I did the e-mail?**  
12 Q. Right.  
13 **A. At that time I was very busy and there was a lot**  
14 **of people in the hallway, so maybe not that moment.**  
15 Q. Okay.  
16 **A. It could have been done that day. I don't know.**  
17 Q. Do you remember testifying that you had printed  
18 out, towards the end of your employment you had printed  
19 out a bunch of e-mails?  
20 **A. Tried, tried to get as many as I can.**  
21 Q. Okay. Do you think maybe you wrote some notes on  
22 the e-mails then as you went back, looking through them  
23 later?  
24 **A. I could have.**

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1 Q. Okay.  
2 **A. But I also, you know, I printed periodically,**  
3 **actually.**  
4 **I mean, the majority of them was on my, you**  
5 **know, stayed on my computer, stayed on the hard drive.**  
6 **If they kept them, I doubt it.**  
7 Q. When you printed out that group of e-mails, you  
8 printed out as many as you could at that time and then  
9 you took them home with you; is that right?  
10 **A. Not in January.**  
11 Q. Right. In April?  
12 **A. Yes.**  
13 Q. And then do you remember whether you did write  
14 notes on them or make notes about them as you kind of  
15 went through in your memory?  
16 **A. Like I said, I'm always jotting down little**  
17 **things. So I don't know.**  
18 Q. That's fair enough. I would like you to go ahead  
19 and read the statement. Since it is your handwriting you  
20 will probably do a better job.  
21 **A. Would you like for me to read the --**  
22 Q. I'm sorry, the handwritten statement. And then  
23 we can talk about it afterwards.  
24 **A. "Prior to Randolph reading his copy of this**

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1 **e-mail he took me in Ford's office (after he was in mine)**  
2 **to confirm me working Saturday," parenthesis -- wait a**  
3 **minute -- "in Ford's office (after he was in mine) to**  
4 **confirm me working Saturday, January 11th, 2003. Ford**  
5 **said okay with him. When Randolph was in my office prior**  
6 **to asking me to go to Ford's with him he came in and**  
7 **asked, 'Do you want to work Saturday?' Of course I said**  
8 **'Yes.' He started to walk towards the door, turned**  
9 **around, pointed at me and said, 'By the way wear a dress**  
10 **with no panties,' quickly turned and dashed out like a**  
11 **ballerina. (He did that often.) I got so pissed off and**  
12 **he thinks it is funny and he dashes out laughing really**  
13 **makes me sick to my stomach."**  
14 **Yes, this was all true.**  
15 **"He does that before I can yell at him.**  
16 **That mother fucker is lucky I don't yell at him as his**  
17 **ass is flying down the hall. He would have shit if I did**  
18 **that with someone else in their office. He would so**  
19 **scared" -- that's a handwritten typo on my behalf, "he**  
20 **would so scared." He was, should have been "was";**  
21 **"scared thinking I was going to yell/tell the shit he**  
22 **says and does."**  
23 Q. Does that help you recollect the incident on  
24 January 7?

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1 **A. Sure.**  
2 Q. Now, do you think that he was dashing out of the  
3 office because he was scared?  
4 **A. I think he was dashing out as he always did to**  
5 **get away from me, but besides that, there was many people**  
6 **there that day. They should have lots of records because**  
7 **they kept records of vendors as well.**  
8 Q. So your testimony is that he left the office  
9 after he said the comment so that he could get away from  
10 you?  
11 **A. Mm-hmm, yes.**  
12 Q. And did he ever say this incident to you again  
13 about wearing a dress with no panties?  
14 **A. What about it?**  
15 Q. I'm sorry. Did he ever say that after January  
16 7th?  
17 **A. No.**  
18 Q. Did he ever say it before January 7th?  
19 **A. No.**  
20 Q. Any other comments similar to that?  
21 **A. Coming to work wearing a dress with no panties,**  
22 **no.**  
23 **MS. DIBIANCA: Okay. Do you want to take a**  
24 **break?**

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